

THE VALPARAISO STATE BANK,
A State Banking Institution,

Plaintiff,

vs.

HARLAN E. DAVIS,

Defendant.

Y

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

6696

COUNT ONE:

The Plaintiff claims of the Defendant Two Hundred and Twelve Dollars and Twelve Cents (\$212.12) due by Promissory Note and made by him on the 11th day of January, 1965, and payable on the 11th day of April, 1965, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay an attorney's fee of Ten Percent (10%) toward the cost of collecting this note after maturity and the Plaintiff further claims of the Defendant the further and additional sum of Twenty-one Dollars and Twenty-one Cents (\$21.21) as such attorneys fee.

COUNT TWO:

The Plaintiff claims of the Defendant Four Hundred and Fourteen Dollars and Fifty Cents (\$414.50) due by Promissory Note made by him on the 1st day of December, 1964, and payable on the 7th day of May, 1965, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure said note, including a reasonable attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Seventy-five Dollars (\$75.00) as such reasonable attorneys fee.

CHASON, STONE & CHASON

FILED

SEP 21 1965

ALICE J. BARK, CLERK
REGISTER VOL

By John Earle Chason
Attorneys for Plaintiff

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10-6-69

6696

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* * * * *

IN THE CIRCUIT COURT OF

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AT LAW

* * * * *

FILED

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ALICE J. DUCK, CLERK
REGISTERED

Employed: Greer's Bay Minette
Resides: Robertsdale, Ala.

CHASON, STONE & CHASON
ATTORNEYS AT LAW

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6696

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Harlan E. Davis

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Harlan E. Davis

....., Defendant.....

by The Valparaiso State Bank, a State Banking Institution

....., Plaintiff.....

Witness my hand this 21st day of September 19 65

Alice S. Slick
....., Clerk

No. 6696

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

THE VALPARAISO STATE BANK, A

State Banking Institution,

Plaintiffs

vs.

HARLAN E. DAVIS

Defendants

SUMMONS AND COMPLAINT

Filed September 21st 19 65

Alice J. Duck Clerk

Chason, Stone & Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

SEP 21 1965

19.....

TAYLOR WILKINS

SHERIFF

....., Sheriff

I have executed this summons

this Oct 6 1965

by leaving a copy with

Harlan E Davis

Taylor Wilkins Sheriff

W. A. Zeller Deputy Sheriff

om