

AID LOAN SYSTEM, INC., a corporation,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
HENRY GIBBS and CALEDONIA GIBBS,)	6448
jointly and individually,)	
Defendants.)	

Plaintiff claims of the Defendants the sum of SIX HUNDRED NINETY-EIGHT AND 97/100 (\$698.97) DOLLARS due by promissory note made by them on 9th day of December, 1963, and payable in monthly installments of FORTY SIX AND NO/100 (\$46.00) DOLLARS beginning on the 9th day of January, 1964.

That in and by the terms of said note, failure to pay any installment of the note or to fulfill any of the obligations undertaken would be at the option of the holder without demand or notice mature all remaining installments, and the Plaintiff now declares the entire indebtedness due and payable.

That in and by the terms of said note, the Defendants waived all rights under the laws of the State of Alabama and the Constitution, and from Homestead Exemption, and the Plaintiff now claims the benefit of said Waiver.

That in and by the terms of said note, the Defendants agreed to pay all costs of collection, whether secured by suit or otherwise, including a reasonable attorney's fee, and the Plaintiff now claims the further and additional sum of ONE HUNDRED FIFTY AND NO/100 (\$150.00) DOLLARS as a reasonable attorney's fee.

FILED

MAR 28 1965

ALICE J. DUCK, CLERK
REGISTER

ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 62448

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HENRY GIBBS and CALEDONIA GIBBS,
jointly and individually,

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.....
HENRY GIBBS and CALEDONIA GIBBS, jointly and individually, Defendant. S.
by AID LOAN SYSTEM, INC., a corporation,
....., Plaintiff.....

Witness my hand this 23 day of March 1965
64-3-26-65 Alice J. Week Clerk

No. 62448

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

AID LOAN SYSTEM, INC., a

corporation,

Plaintiffs

vs.

HENRY GIBBS and CALEDONIA GIBBS,

jointly and individually,

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

MAR 23 1965

ALICE I. DUCK

CLERK
REGISTRY

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Box 805 Twin Beach Rd., Fairhope
or Henry works at Grand Hotel
& Caledonia works at Colonial
Inn, Fairhope, Ala.

Received In Office

March 24 1965

....., Sheriff

I have executed this summons

this 3/26/ 1965

by leaving a copy with

Henry & Caledonia
Gibbs

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

J. B. ...

AID LOAN SYSTEM, INC., a
corporation,

Plaintiff,

vs.

HENRY GIBBS and CALEDONIA
GIBBS, jointly and individual-
ly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Comes the Defendant in the above styled cause and
offers the following pleas:

(1) The Defendants, for answer to said complaint,
saith that they have paid the debt for the recovery of
which this suit was brought, before the action was com-
menced;

(2) The Defendants, in answer to the complaint,
saith that the note upon which this action was founded,
includes usurious interest in the form of approximately
\$432.20, \$263.98 on the original indebtedness, and \$168.22
on the renewal note, which is now being sued on.


ATTORNEY FOR DEFENDANT

FILED

APR 8 1965

ALICE J. DUCK, CLERK
REGISTER

SPEED LETTER

DUCK & LACEY
Attorneys at Law
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck

P. O. Box 239

Bay Minette, Alabama

DATE March 22, 1965

Re: AID LOAN SYSTEM, INC. vs. HENRY GIBBS
& CALEDONIA GIBBS

Dear Mrs. Duck:

Enclosed please find Bill of Complaint for
filing together with copy of same and
Summons for serving.

Sincerely,

SIGNED

FORM AVAILABLE FROM GRAYARC CO., INC.
982 THIRD AVE., B'KLYN 32, N. Y.

DATE

SIGNED

THIS COPY FOR PERSON ADDRESSED

CODE 205
Telephone: 928-9836

LAW OFFICES

Mailing Address
P.O. BOX 471

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

March 24, 1966

Honorable Telfair J. Mashburn
Circuit Judge
Bay Minette, Alabama

Dear Judge Mashburn:

Inre: Aid Loan Company
Vs: Henry and Caledonia Gibbs
Case No. 6448 non-jury
Our File: 65-83

In this case Plaintiff is suing for \$848.97. Mr. Duck and I are agreeing for you to enter a judgment for consent for \$425.00, plus costs, and am sending a copy of this letter to Mr. Duck to forward to the Court and we can dispose of this case.

Respectfully submitted,


EGR/jlb
Encl.

cc: Mr. John Duck
cc: Mr. Henry Gibbs
4-4-66

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

April 7, 1965

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Aid Loan System, Inc.
Vs: Henry Gibbs
Court Case No. 6448
Our File: 65-83

Enclosed find answer in the above styled case. Please
process and oblige.

Am sending copy of this to Messrs. Duck and Lacey, attorneys
for the Plaintiff.

Respectfully submitted,



EGR/jlb
Encl.
cc: Duck & Lacey
4-17-65