

WILLIAM G. DOSS, JR.,  
PLAINTIFF

VS

ALBERT FRANKLIN BEAL, and  
MRS. ALBERT FRANKLIN BEAL,  
DEFENDANTS

I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA  
I AT LAW  
I  
I NO. 6923  
I

1.

The Plaintiff claims of the Defendant's ONE HUNDRED SEVENTY-ONE DOLLARS (\$171.00) balance due after all proper credits given on a promissory note made by the Defendant's on the 29th day of October, 1965, and payable in eight monthly installments of THIRTY DOLLARS (\$30.00) each, payable on the 15th day of each month, beginning November 15, 1965. The Plaintiff avers that the Defendant's defaulted in payment of the third and subsequent installments and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff claims interest at the rate of 6% per annum from December 24, 1965. The Plaintiff further avers that the Defendant's agreed in the promissory note to pay all expenses including reasonable attorney's fees incurred in collecting the same, and the Plaintiff claims a reasonable attorney's fee in the amount of TWENTY-FIVE DOLLARS (\$25.00).

FILED

APR 4 1966

ALICE J. DICK, CLERK  
REGISTER

WILTERS, BRANTLEY & NESBIT

By: Thyler S. Nesbit

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6923

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALBERT FRANKLIN BEAL and  
MRS. ALBERT FRANKLIN BEAL

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.....  
ALBERT FRANKLIN BEAL and MRS. ALBERT F. BEAL....., DefendantS...

by .....  
WILLIAM G. DOSS, JR...... Plaintiff.....

Witness my hand this 4<sup>th</sup> day of April 19 66  
Alice J. (illegible)..... Clerk

No. 6923

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIAM G. DOSS, JR.

Plaintiffs

vs.

ALBERT FRANKLIN BEAL and

MRS. ALBERT FRANKLIN BEAL

Defendants

SUMMONS AND COMPLAINT

FILED

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CLERK

Clerk

ALICE T. DICK, REGISTER

Wilters, Brantley & Nesbit

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Julius Childress Dairy  
Robertsdale, Ala.

RECEIVED  
Received In Office

APR 7 1966 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this April 8, 1966

by leaving a copy with

Albert Franklin Beal

Mrs. Albert Franklin Beal

Sheriff claims 100 miles or

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY Carlisle Childress

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Carlisle Childress Deputy Sheriff

R. W. Deale