

SUMMONS AND COMPLAINT

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NO. _____

_____TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Fred Jefferson of Bay Minette, Alabama to appear and plead, answer of 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 Fred Jefferson, Defendant by Willie Thomas, Plaintiff.

Witness my hand this 14 day of April, 1966.

Wm. J. Black, Clerk.

* * * * *

WILLIE THOMAS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
Vs.) AT LAW *No. 6933*
FRED JEFFERSON,)
Defendant.)

COUNT ONE :

Plaintiff claims of the Defendant the sum of \$189.00, with interest thereon, as balance due by certain note, executed 6 March, 1962, and payable 6 January, 1963, to the First National Bank of Bay Minette, Alabama, or order, said note being for \$189.00, signed by the Defendant, Fred Jefferson. Plaintiff avers that Defendant was the principal indorser on said note for the maker thereof, that he lent his indorsement to said note in order to his credit thereto, and that the Plaintiff has had to pay said note in full, and the Defendant has paid nothing thereon, and has declined payments or contributions to them on said note, though requested to do so, and your Plaintiff is the holder and owner of said note, the amount being paid by renewal of said note and assigned to Plaintiff.

COUNT TWO:

Plaintiff claims of the Defendant the sum of \$189.00 with interest thereon since 6 March, 1962, in this, the Defendant and Plaintiff were sureties on a certain note, executed by the Defendant, on 6 March, 1962, for \$189.00, payable at the rate of \$18.90 per month for ten months, and Plaintiff, and payable to the First National Bank of Bay Minette, Alabama or order and Plaintiff, as said Surety, paid the whole of said note, and this suit is for the purpose of making collections of said Defendant as his part as contribution, to this Defendant, the said Defendant having paid nothing on said note, and same is due and payable, with interest, and it is unpaid.


Attorney For Plaintiff

Defendant's address:
Fred Jefferson
565 West Hurricane Road
Bay Minette, Alabama

Not Found

Received 12 day of April 1966
and on _____ day of _____ 19____
I received a copy of the within S.C.
Fred. Jefferson
by service on _____
TAYLOR WILKINS, Sheriff
By _____ D. S.

Returned 24 day of April 1966
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By W. A. Talbot Deputy Sheriff
sup north

CASE NO. 6933

WILLIE THOMAS,

PLAINTIFF,

VS.

FRED JEFFERSON,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FILED
APR 12 1966
AUGUST DUSK, CLERK
REGISTERED

KENNETH COOPER

ATTORNEY AT LAW

109 EAST 1ST STREET

RAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NO. _____

TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Fred Jefferson of Bay Minette, Alabama 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 Fred Jefferson, Defendant by Willie Thomas, Plaintiff.

Witness my hand this 12 day of April, 1966.

Rebecca J. Smith, Clerk.

WILLIE THOMAS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
Vs.)	AT LAW
FRED JEFFERSON,)	<u>W. 6933</u>
Defendant.)	

COUNT ONE:

Plaintiff claims of the Defendant the sum of \$189.00, with interest thereon, as balance due by certain note, executed 6 March, 1962, and payable 6 January, 1963, to the First National Bank of Bay Minette, Alabama, or order, said note being for \$189.00, signed by the Defendant, Fred Jefferson. Plaintiff avers that Defendant was the principal indorser on said note for the maker thereof, that he lent his indorsement to said note in order to his credit thereto, and that the Plaintiff has had to pay said note in full, and the Defendant has paid nothing thereon, and has declined payments or contributions to them on said note, though requested to do so, and your Plaintiff is the holder and owner of said note, the amount being paid by renewal of said note and assigned to Plaintiff.

SUMMONS AND COMPLAINT

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NO. _____
TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Fred Jefferson of Bay Minette, Alabama to appear and plead, answer or demur within thirty days from the service hereof, to the complaint filed on

Witness my hand this 14 day of _____, 19__.

WILLIE THOMAS, Plaintiff,
vs.
FRED JEFFERSON, Defendant.

COUNT ONE:
Plaintiff claims of the Defendant the sum of \$189.00, with interest thereon, as balance due by certain note, executed & dated March, 1902, and payable & January, 1903, to the First National Bank of Bay Minette, Alabama, or order, said note being for \$189.00, signed by the Defendant, Fred Jefferson. Plaintiff avers that Defendant was the principal indorser on said note for the maker thereof, that he lent his indorsement to said note in order to his credit thereto, and that the Plaintiff has had to pay said note in full, and the Defendant has paid nothing thereon, and has declined payments or contributions to them on said note, though requested to do so, and your Plaintiff is the holder and owner of said note, the amount being paid by renewal of said note and assigned to Plaintiff.

COUNT TWO:

Plaintiff claims of the Defendant the sum of \$189.00 with interest thereon since 6 March, 1962, in this, the Defendant and Plaintiff were sureties on a certain note, executed by the Defendant, on 6 March, 1962, for \$189.00, payable at the rate of \$18.90 per month for ten months, and Plaintiff, and payable to the First National Bank of Bay Minette, Alabama or order and Plaintiff, as said Surety, paid the whole of said note, and this suit is for the purpose of making collections of said Defendant as his part as contribution, to this Defendant, the said Defendant having paid nothing on said note, and same is due and payable, with interest, and it is unpaid.


Attorney For Plaintiff

Defendant's address:

Fred Jefferson
565 West Hurricane Road
Bay Minette, Alabama

FILED
MAR 12 1962
U.S. DISTRICT COURT
BAY MINETTE, ALABAMA