

STATE OF ALABAMA            )  
                                  ) TO ANY SHERIFF OF THE STATE OF ALABAMA:  
BALDWIN COUNTY            )

You are hereby commanded to summon MARQUIN STYRON, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of BALDWIN NATIONAL BANK of ROBERTSDALE, A National Banking Association.

Witness my hand, this the 21 day of April, 1966.

Heisey J. Smith  
Clerk

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BALDWIN NATIONAL BANK of ROBERTSDALE, A National Banking Association,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs	)	
	)	
MARQUIN STYRON,	)	AT LAW
	)	
Defendant.	)	No. _____

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY TWO & 92/100 (\$192.92) DOLLARS, due by promissory note made by her on the 8th day of December, 1965, and payable in twelve monthly installments, each in the sum of \$15.91, except the first installment which is in the sum of \$17.91, beginning with January 20th, 1966, which sum of money with interest thereon, is still unpaid.

The Defendant does by this note waive as to this debt all right of exemption under the Constitution and Laws of the State of Alabama, or any other State, and the Plaintiff claims the benefit of said waiver.

Plaintiff further avers that as a part of the consideration for said note, and which said note provides that the Defendant would pay all costs of collecting said note, including a reasonable attorney's fee, and the Plaintiff claims of the Defendant the further and additional sum of SEVENTY FIVE (\$75.00) DOLLARS, as a reasonable attorney's fee in the premises.

John P. Beebe,  
Attorney at Law,  
Robertsdale, Alabama.

John P. Beebe  
Attorney for Plaintiff

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Received  
Apr. 29, 1966

Old the jury find favor of  
Thirteenth of April 1966  
at 250<sup>00</sup>  
Hedman  
Cano Woods

6944

Baldwin National Bank  
of Robertsdale  
27 day of April 1966  
For 29 day of April 1966  
I have a copy of the within  
Marvin Styrac

05  
Marvin Styrac  
Midway Truck  
Midway 90  
Lafayette

service on

TAYLOR WILKINS, Sheriff  
By W. O. Garner D. S.

4 mi to Lafayette

Sherry claim 48  
Tax Conts for Total 4.80  
TAYLOR WILKINS  
By W. O. Garner  
DEPUTY SHERIFF

FILED

APR 27 1966

JOHN P. BRADY  
CLERK  
IN CHARGE

John P. Brady, Atty

BALDWIN NATIONAL BANK of ROBERTSDALE, X  
A National Banking Association, X

PLAINTIFF, X

VS: X

MARQUIN STYRON, X

DEFENDANT. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

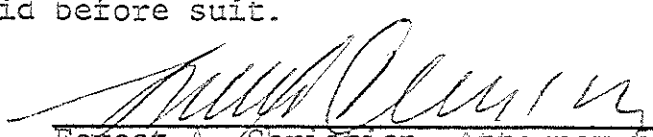
AT LAW

CASE NO. 6944


ANSWER

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's Complaint states as follows:

1. That she denies allegations contained in paragraph One of said Complaint.
2. That she does not owe the debt.
3. That the debt was paid before suit.

  
Forest A. Christian, Attorney for  
Defendant

The Defendant demands trial by jury.

  
Forest A. Christian, attorney for  
Defendant.

I certify that a copy of this pleading has been sent to John P. Beebe, Esq., Robertsedale, Alabama.

  
Forest A. Christian, Attorney for Defendant.

FILED  
MAY 23 1956  
ALICE L. DICK, Clerk  
189

# Baldwin National Bank

NO. 6944

ADDS  
OBSX

JURY LIST - DECEMBER 12, 1968

1. Allen, Norman W., Farmer, Gateswood
2. Andress, Herbert B., Farmer, Foley
3. Andress, Anthony J., Farmer, Elberta
4. Andress, P. Gary, Oil Distributor, Bay Minette
5. Childress, Gay, Farmer, Robertsdale
6. Clark, Percy, Mill Worker, Stockton
7. Clay, Harris, Mechanic, Fairhope
8. Coagin, Ned, Farmer, Summerdale
9. Cooper, Grady, Farmer, Elsecanor
10. Cooper, Robert E., Merchant, Rosinton
11. Danose, James W., Gov. Emp., Gulf Shores
12. Gamble, L. Jack, Salesman, Bay Minette
13. Gibson, Leon Fisher, Mechanic, Bay Minette
14. Graham, James R., Laborer, Bay Minette
15. Grantham, Donald R., Farmer, Mag. Spgs.
16. Sweetney, William H., Clerk, Robertsdale
17. Hollies, Thomas E., Gulf Gas Agent, Robertsdale
18. Jenkins, Marvin B., Civil Service, Stapleton
19. Jones, George, Business Operator, Daphne
20. Kato, James, Farmer, Loxley
21. Kriss, Frank, Farmer, Silverhill
22. Langer, Stanley, Mechanic, Robertsdale
23. Lazzari, Joe, Jr., Farmer, Belforest
24. Lazzari, John, Farmer, Belforest
25. Mosley, Rufus, Farmer, Stapleton
26. Novotny, Milton J., Farmer, Robertsdale
27. Owen, L. D., Jr., Merchant, Bay Minette
28. Rhodes, Charles R., Farmer, Foley
29. Rhodes, Elbert M., Farmer, Summerdale
30. Rieben, Everett, Brookley, Bay Minette
31. Rieben, Ray, Paper Mill, Bay Minette
32. Roberson, Mutt, Laborer, Robertsdale
33. Robinson, Odell, Contractor, Bay Minette
34. Sefton, Robert, Farmer, Robertsdale
35. Sheppard, Lloyd, Farmer, Foley
36. Simon, Arthur, Farmer, Belforest
37. Smith, Columbus, Mill Worker, Stockton
38. Veal, Arthur, Attendant, Summerdale
39. Wilson, George, Airport Oper., Foley
40. Wilsey, James, Clerk, Loxley
41. Winding, Bailey, Sr., Carpenter & Bricklayer, Daphne
42. Mason, Jimmy, Salesman, Fairhope
43. Davidson, W. H., Turpentine Farmer, Bay Minette
44. Marino, Percy, Mobile Housing Board, Daphne
45. Heil, William, Farmer, Elberta
46. Bryans, Charles Henry, Jr., Farmer, Stockton
47. Childress, Lynett, Farmer, Foley
48. Cook, John D., Merchant, Montrose
49. Cooper, Charles, Farmer, Rosinton
50. Estava, Clarence, Farmer, Mag. Spgs.
51. McLeod, George, State Emp., Gulf Shores
52. Hodgason, William M., Jr., Manufacturer, Bay Minette
53. Lamar, Reuben, Laborer, Foley

P XXXXX XXXXX XX =

D XXXXX XXXXX XXX

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BALDWIN NATIONAL BANK OF )  
ROBERTSDALE, )

Plaintiff )

VS. )

MARQUIN STYRON )

Defendant )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6944

AMENDED ANSWER

Comes the Defendant in the above styled cause and amends her answer hertofore filed as follows:

PLEA ONE

The defendant for answer to the complaint saith that the note , upon which the action was founded, was not executed by her , or by anyone thereto lawfully authorized in writing to bind her in the premises; and she makes oath that this plea is true.

PLEA TWO

The defendant for further answer to the complaint saith that was no consideration received by her for the execution of the note, upon which this action was founded, and the note is void for want of consideration; and she makes oath that this plea is true.

PLEA THREE

The defendant, for further answer to the complaint saith she is not guilty of the matters alleged therein.

Marquin Styron  
Defendant

Before me the undersigned authority, personally appeared Marquin Styron, who first being duly sworn doth depose and say on Oath: that the allegations contained in the foregoing pleas are true.

Marquin Styron

Subscribed and sworn to before me on this the 7th day of December, 1966.

Arthur C. Epperson

FILED

DEC 14 1966

ALICE J. DICK, CLERK  
REGISTER