

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

You are commanded to summon JAMES S. WILLIAMS, 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 27 day of April, 1966.

Marie J. March
 Clerk

BALDWIN NATIONAL BANK of ROBERTSDALE, A National Banking Association,)	IN THE CIRCUIT COURT OF
)	
vs)	BALDWIN COUNTY, ALABAMA
)	
JAMES S. WILLIAMS,)	AT LAW,
)	
Defendant.)	No. <u>6945</u>

COUNT ONE

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIVE & No/100 (\$305.00) DOLLARS, due by promissory note made by him on the 20th day of November, 1964, and payable on the 19th day of January, 1965, with interest thereon, is still unpaid.

Plaintiff avers that the Defendant is entitled to a credit on said note in the amount of SEVENTY FIVE & 92/100 (\$75.92) DOLLARS.

The Defendant by said note waives 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 ONE HUNDRED (\$100.00) DOLLARS, as a reasonable attorney's fee in the premises.

COUNT TWO

The Plaintiff claims of the Defendant the further sum of FOUR HUNDRED TEN & 09/100 (\$410.09) DOLLARS, due by promissory note made by him on the 21st day of December, 1964, and payable on the 22nd day of March, 1965, which sum of money with interest thereon is still unpaid.

The Defendant by said note waives 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 attorneys fee, and the Plaintiff claims of the Defendant the further and additional sum of ONE HUNDRED (\$100.00) DOLLARS, as a reasonable attorney's fee in the premises.

John P. Beebe
Attorney for Plaintiff

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

64-5-16-65

FILED

APR 27 1965

CLERK
ALICE L. DAVIS

343

W. 6945

Baldwin National Bank
of Rotterdam

VS

James S. Williams
Jim Williams Inc.
Day Mynette Agency

FILED

APR 27 1969

AME A. DICK, CLERK
REGISTER

John P. Beebe Jr.

Received 27 day of April
and on 16 day of May
I received a copy of the within
on James S. Williams

By service on
TAYLOR WILKINS, Sheriff
By W. A. Tolbert
Rakem

Sheriff claims 22 miles at
Ten Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
Deputy Sheriff