

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons HILLIARD P. JENKINS, 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, Alabama, at the place of holding same by FARMERS & MERCHANTS BANK, Foley, Alabama, a corporation.

Witness my hand this the 6th day of June, 1966.

Alice J. Duck
Clerk

** ** *

COMPLAINT

FARMERS & MERCHANTS BANK of	X	
Foley, Alabama, a corporation,	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
PLAINTIFF,	X	
VS:	X	AT LAW
HILLIARD P. JENKINS,	X	7004
DEFENDANT.	X	

The Plaintiff claims of the Defendant ONE THOUSAND FOUR HUNDRED FORTY-FOUR & 30/100 DOLLARS (\$1,444.30), due by promissory waive note made by him on the 6th day of August, 1959, and payable on the 2nd day of February, 1966, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be TWO HUNDRED EIGHTY & 00/100 DOLLARS (\$280.00).

Forest A. Christian
Forest A. Christian, Foley, Alabama,
Attorney for the Plaintiff

DEFENDANT'S ADDRESS:

Loxley, Alabama

FILED
JUN 6 1966
ALICE J. DUCK, CLERK

FARMERS & MERCHANTS BANK of
Foley, Alabama, a corporation,

Plaintiff,

vs.

HILLIARD P. JENKINS,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7004

PLEA

Comes now the Defendant in the above styled cause, by
his attorneys, and for plea to the Complaint heretofore filed
against him pleads, separately and severally, as follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

By: _____

John Seale Chason

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 13th day

of July, 1966.

John E. Chason

FILED

JUL 13 1966

ALICE L. DICK, CLERK

5 mi west Lerley

Sho. off claims 30 miles 50
 To/ Cents per mile Total \$ 1
 T. A. OR W. KINS, Sheriff
 W. A. Hare,
 DEPUTY SHERIFF

SUMMONS

FARMERS & MERCHANTS BANK, Foley,
Alabama, a corporation,

PLAINTIFF,

VS:

HILLIARD JENKINS,

Loxley, Ala.

DEFENDANT.

Returned
Not Found in
County of
day of
after diligent search and in-
vestigation
1966