

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Morgan J. Odom 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 Lavon R. Turner.

WITNESS my hand this 4th day of August, 1966.

Alice J. Luck
Clerk

Defendant may be served at Carson Printing Company, Foley, Alabama.

* * * * *

LAVON R. TURNER,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
MORGAN J. ODOM,)	AT LAW
)	
Defendant.)	7101

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant Three Hundred Ninety-one and 04/100 Dollars (\$391.04) balance due from him by a promissory note made by him on February 25, 1965, and payable to the Merchants National Bank of Mobile, Mobile, Alabama, and due and payable in 24 consecutive monthly installments of \$25.00, beginning March 25, 1965, and which note is now the property of the plaintiff with the interest thereon. Plaintiff avers that in said note, and as part thereof, the defendant waived his right of exemptions as to personal property as against the collection thereof. Plaintiff avers that in said note and as part thereof, the defendant agreed to pay a reasonable attorney's fee for the collection thereof, which said attorney's fee plaintiff avers to be \$58.65 and which he herewith claims.

FILED

AUG 10 1966
CLERK
REGISTER

[Signature]
Attorney for Plaintiff

CASE NO. 7101

LAVON R. TURNER,

Plaintiff,

vs:

MORGAN J. ODOM,

Defendant

* SUMMONS & COMPLAINT *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7101

FILED

AUG 9 1968

AUDIE A. DUCK, CLERK
REGISTER

JAMES R. OWEN, Atty.

on 4 day of Aug. 66
on 4 day of August 66

received a copy of the within \$86
Morgan J. Odom

service on Morgan J. Odom

TAYLOR WILKINS, Sheriff
By J. M. Earthen
Goley, Ala.

received at 72
at 72
by J. M. Earthen
DEPUTY SHERIFF