JOHN P. BEEBE Attorney at Law Robertsdale, Alabama

August 18th, 1966

Mrs. Alice J. Duck, Clerk, Circuit Court, Baldwin County, Bay Minette, Alabama.

Dear Mrs. Duck:

Enclosed are summons and complaint, in duplicate, in three separate suits, which name the First National Bank of Fairhope, as the Plaintiff.

 $\gamma \gamma \gamma$ 1. Ronnie F. Dyess, Stapleton, Alabama, is the Defendant named in one suit. He is white.

2. Fred Graves, 914 Dobson Avenue, Bay Minette, is the Defendant named in one other suit. He is colored.

3. Walter Lee Moorer, 412 West Hurricane, Bay Minette, is the Defendant named in the other suit. He is colored.

Would appreciate it if the summons may be issued and the summons and complaint in each case be placed in the hands of the Sheriff for service on the Defendants.

Thank you, I am

Yours very truly,

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summon RONNIE F. DYESS, 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 FIRST NATIONAL BANK OF FAIRHOPE, a National Banking Association.

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RONNIE F.	DYESS, U N		• *	2	
	Defendan	, , , , , , , , , , , , , , , , , , ,	No.	1121	

The Plaintiff claims of the Defendant the sum of THREE THOUSAND FIVE HUNDRED & EIGHTY SEVEN & No/100 (\$3,587.00) DOLLARS, due by promissory note made by him on the 16th day of October, 1965, and payable in thirty five (35) monthly installments each in the sum of ONE HUNDRED (\$100.00) DOLLARS, beginning with December 2nd, 1965, and a like amount on the same date of each succeeding month thereafter, which said note provides in the event of default in the payment of any installment of principal or interest, the Plaintiff shall have the right at its election and without notice to the Defendant to declare the entire indebtedness evidenced by said note immediately due and payable, which said note is still unpaid.

Plaintiff avers that the Defendant is entitled to a credit on said note in the amount of FIVE HUNDRED (\$500.00) DOLLARS.

The Defendant by said note waived as to this debt all rights 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

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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 the further and additional sum of FIVE HUNDRED (\$500.00) DOLLARS, as a reasonable attorney's fee in the premises.



Attorney for Plaintiff

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vs: RONNIE F. DYESS, Stapleton, Ala. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW, CASE NO. 7127 SUMMONS & COMPLAINT

· g___day of__ Plaintiff, ived a copy of the within YR 430nnie J los by service on Defendant TAYLOR WILKINS, Sheriff By Cherky

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John P. Beebe, Atty.

CASE NO. 7127

FIRST NATIONAL BANK OF FAIRHOPE, A National Banking Association,

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