

THELMA K. MACON, as Executrix X  
of the Estate of Floy V. Macon,  
deceased, X

Plaintiff, X

vs. X

WILLIAM C. MACON, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. \_\_\_\_\_

Comes now the Defendant in the above styled cause, and  
for answer to the Complainants Complaint, says:

1.

That he is not guilty of the matters alleged therein.

2.

That he has paid the debt, for the recovery of which  
this suit was brought, before the action was commenced.

WILTERS & BRANTLEY

BY: \_\_\_\_\_

Attorneys for the Defendant

Defendant demands a trial

by jury.

WILTERS & BRANTLEY

BY: \_\_\_\_\_

Attorneys for the Defendant

FILED

DEC 5 1966

FILED IN BOOK, CLERK, REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 5<sup>th</sup> day of December, 1966, served a copy of the foregoing pleading in case to all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

\_\_\_\_\_  
Attorneys for the Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7249

THELMA K. MACON, as Executrix  
of the Estate of Floy V. Macon,  
Deceased.

Plaintiff,

vs.

WILLIAM C. MACON,

Defendant,

ANSWER

WILTERS & BRANTLEY  
Attorneys at Law  
Bay Minette, Alabama

FILED

DEC 5 1966

ALICE L. RUCK, CLERK  
REGISTERED

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William C. Macon 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 same, then and there to answer the Complaint of Thelma K. Macon, as Executrix of the Estate of Floy V. Macon, deceased.

Witness my hand this 9th day of November, 1966.

Alice J. Luck  
Clerk

THELMA K. MACON, as Executrix X  
of the Estate of Floy V. Macon, X  
deceased, X

Plaintiff, X

vs. X

WILLIAM C. MACON, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

7249

COUNT ONE:

The Plaintiff claims of the Defendant Twelve Thousand Eight Hundred Twenty-three Dollars and Ninety-nine Cents (\$12,823.99) due by promissory note made by him on the 1st day of March, 1954, and payable One Hundred Dollars (\$100.00) per month, including interest, at the rate of five percent (5%) per annum, default in the payment of which has been made by the Defendant, with interest thereon at the rate of eight percent (8%) per annum from August

24, 1966.

The Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee; and the Plaintiff, therefore, claims of the Defendant the further and additional sum of Two Thousand Five Hundred Dollars (\$2,500.00) as such reasonable attorney's fee.

The Plaintiff further alleges that in and by the terms of said promissory note the Defendant waived, as to the debt evidenced thereby, all right of exemption under the Constitution and Laws of Alabama, or any other State, and the Plaintiff does hereby claim the benefit of said waiver.

Respectfully submitted,

CHASON, STONE & CHASON

By:

  
Attorneys for Plaintiff

*Nov. 9, 1966*

*I hereby accept service of the 58c as  
attorney for William E. Mason*

  
att'y

FILED

NOV 9 1966

ALICE L. DUCK, CLERK  
REGISTER

THELMA K. MACON, as Executrix  
of the Estate of Floy V. Macon,  
deceased,

Plaintiff,

vs.

WILLIAM C. MACON,  
Defendant.

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SUMMONS AND COMPLAINT

\*\*\*\*\*

FILED

NOV 9 1969

AUGIE L. DICK, CLERK  
REGISTER

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. BOX 120  
BAY MINETTE, ALABAMA