

JOHN V. DUCK
ATTORNEY AT LAW
P. O. BOX Y
FAIRHOPE, ALABAMA 36532

October 6, 1967

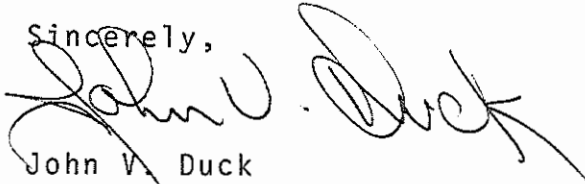
Mrs. Alice J. Duck
P. O. Box 239
Bay Minette, Ala.

Re: Carlton Shumock vs.
Shoreline Realty and
Hubert Turner. Civil
Case No. 7406

Dear Mrs. Duck:

Would you please have the Judge enter a Judgment by
Default on the enclosed note in the amount of \$350.00
principal, \$15.00 interest and \$40.00 attorneys fees.

Sincerely,



John V. Duck

JVD:Th
Encls.

JOHN V. DUCK
~~DUCK & ALACEY~~

Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE April 21, 1967

Re: Shumock vs. Shoreline Realty.

Civil Case No. 7406

Dear Mrs. Duck:

We have just received a Return on captioned case saying "Not Found". Please give this case to Deputy Randall again and tell him Hubert Turner can be served at his home in Mary Anne Beach, Point Clear.

Thanks,

SIGNED

DATE

SIGNED

Done
4-24-67

JOHN V. DUCK
~~DUCK & GRACEY~~

Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE March 8, 1967

RE: Carlton Shumock vs. Shoreline Realty, Inc. and

Hubert W. Turner, jointly and severally,

Dear Mrs. Duck:

NO. 7406

Enclosed please find Bill of Complaint to be filed
together with copy of same and Summons to be served.

Sincerely,

John V. Duck
(28)

SIGNED

SIGNED

CARLTON SHUMOCK,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
SHORELINE REALTY, INC., a	)	no. 7406
corporation, and HUBERT W.	)	
TURNER, jointly and severally,	)	
Defendants.	)	

Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY (\$350.00) DOLLARS due by promissory note made by them on the 3rd day of February, 1967, and payable on the 3rd day of March, 1967, which sum of money, with the interest thereon is still unpaid.

That in and by the terms of said note, the Defendants agreed that in the event of default that they would pay all costs of collecting or securing or attempting to collect or secure the note, including a reasonable attorney's fee, and the Plaintiff now claims the further and additional sum of FORTY (\$40.00) DOLLARS as a reasonable attorney's fee.

That in and by the terms of said note, the Defendants waived all rights of exemption under the Constitution and laws of the State of Alabama, and the Plaintiff now claims the benefit of said waiver.

FILED
MAR 10 1967
ALICE L. DUCK, CLERK
REGISTER

John V. Duck
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SHORELINE REALTY, INC., a corporation, and

..... HUBERT W. TURNER, jointly and severally,

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, State of Alabama, at Bay Minette, against.....
SHORELINE REALTY, INC., a corporation, & Hubert W. TURNER, jointly/Defendant.....

by CARLTON SHUMOCK,

....., Plaintiff.....

Witness my hand this..... 12..... day of..... March 1967.....

..... *Deirdre J. French* Clerk

24
5-4-67

ga
No. 7406

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CARLTON SHUMOCK,

Plaintiffs

4 Hawle vs.
SHORELINE REALTY, INC., a corporation,
& HUBERT W. TURNER,
jointly & severally, Defendants

SUMMONS AND COMPLAINT

Filed 19

Clerk

APR 10 1967
ALICE L. DUCK, CLERK
REGISTER

18

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

Citronelle APR 24 1967

Defendant lives at
TAYLOR WILKINS
21 North Section Street
Fairhope, Alabama

RECEIVED

Received In Office

MAR 18 1967

TAYLOR WILKINS
SHERIFF

19

Sheriff

I have executed this summons

this 19

by leaving a copy with

by serving a copy of the writ

Hubert W. Turner

RAY D. DUDGESS, Sheriff

By R. Hawle D.S.

Sheriff

Deputy Sheriff