

MERCHANTS NATIONAL BANK OF MOBILE (  
A Corporation,

Plaintiff,

vs.

JAMES E. CONNELL and NELVA L.  
CONNELL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7542

1.

The Plaintiff claims of the Defendant THREE HUNDRED FIFTY-ONE and 08/100 DOLLARS (\$351.08) due on a promissory note made by the Defendant on the 17th day of September, 1963 and payable in seventy-two monthly installments of FIFTY and 86/100 (\$50.86) DOLLARS, the first installment being due and payable on the 10th day of October, 1963. The Plaintiff avers that the Defendant defaulted in the payment of the installment due the 10th day of September, 1965 and all subsequent monthly installments and that the whole balance has become due and payable. The Plaintiff claims interest at the rate of 8% per annum from the 10th day of September, 1965; this being provided for in the terms of said promissory note. The Plaintiff further avers that the Defendant agreed in said promissory note to pay all expenses including reasonable attorney's fees incurrent in the collecting of the same and the Plaintiff claims a reasonable attorney's fee in the amount of SEVENTY DOLLARS (\$70.00)

WILTERS, BRANTLEY & NESBIT

BY: Thayer S. Nesbit  
Attorneys for the 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 .....James E. Connell and Nelva L. Connell

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.....

.....James E. Connell and Nelva L. Connell....., Defendant.....

by .....Merchants National Bank of Mobile, A Corporation.....

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

Witness my hand this.....1.....day of.....June.....1967

*Executed*

*6-2-67*

*Alvin J. Smith* Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Merchants National Bank of  
Mobile

Plaintiffs

vs.

James Connell and Nelva Connell  
Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

JUN 2 1967

Clerk

ALICE J. DUCK, CLERK  
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

*Gulf Shores, Ala.*  
Received In Office

JUN 1 1967

19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this *2nd* June 19*67*

by leaving a copy with

*Nelva Connell*  
*James Connell*

Sheriff claims *200* miles at  
Ten Cents per mile Total \$ *20.00*  
TAYLOR WILKINS, Sheriff  
BY *Jm. Eastburn*  
DEPUTY SHERIFF

*Taylor Wilkins* Sheriff  
*Jm. Eastburn* Deputy Sheriff  
*Gulf Shores, Ala.*