

S. W. JACOBS

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

MORGAN KIRKLAND

X

AT LAW

NO. _____

Defendant

X

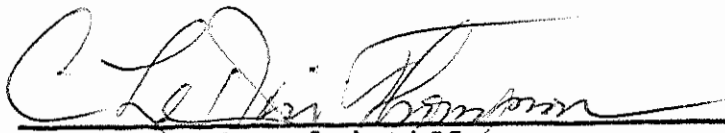
-1-

The plaintiff claims of the defendant the sum of Four Hundred Fifty-four and 30/100 (\$454.30) Dollars being the balance due and unpaid of a promissory waive note in the amount of Four Hundred Eighty-five (\$485.00) Dollars drawn by the defendant on the 18th day of June, 1966, payable to the First National Bank of Bay Minette in 12 installments of \$40.00 each except the final installment which is \$45.00, the first installment being due the 25th day of July, 1966, and each month thereafter until fully paid; with the total unpaid amount becoming due on the failure of defendant to pay any of the individual payments, and the said payments not being paid as they matured, by the said defendant, said note was charged back to the account of the plaintiff herein by the First National Bank of Bay Minette and is owned by the said plaintiff.

Whereas, said note in the balance due amount of Four Hundred Fifty-four and 30/100 (\$454.30) Dollars with interest thereon, is still unpaid.

-2-

The plaintiff claims of the defendant a reasonable attorney fee as provided in the said promissory waive note.


Attorney for plaintiff.

FILED

JUN 7 1967

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7551

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Morgan Kirkland

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.....

Morgan Kirkland

....., Defendant.....

by S. W. Jacobs

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

Witness my hand this 7 day of June 1967

W. J. French Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

S. W. JACOBS

Plaintiffs

vs.

MORGAN KIRKLAND

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Loxley, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

S. W. JACOBS	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
MORGAN KIRKLAND	X	AT LAW NO. _____
Defendant	X	

-1-

The plaintiff claims of the defendant the sum of Four Hundred Fifty-four and 30/100 (\$454.30) Dollars being the balance due and unpaid of a promissory waive note in the amount of Four Hundred Eighty-five (\$485.00) Dollars drawn by the defendant on the 18th day of June, 1966, payable to the First National Bank of Bay Minette in 12 installments of \$40.00 each except the final installment which is \$45.00, the first installment being due the 25th day of July, 1966, and each month thereafter until fully paid; with the total unpaid amount becoming due on the failure of defendant to pay any of the individual payments, and the said payments not being paid as they matured, by the said defendant, said note was charged back to the account of the plaintiff herein by the First National Bank of Bay Minette and is owned by the said plaintiff.

Whereas, said note in the balance due amount of Four Hundred Fifty-four and 30/100 (\$454.30) Dollars with interest thereon, is still unpaid.

-2-

The plaintiff claims of the defendant a reasonable attorney fee as provided in the said promissory waive note.


Attorney for plaintiff.

FILED

JUN 7 1967

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7557

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Morgan Kirkland

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.....

Morgan Kirkland

....., Defendant.....

by S. W. Jacobs

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

Witness my hand this 7 day of June 1967.

Clerk

M. F.

No. 7551

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

S. W. JACOBS

Plaintiffs

vs.

MORGAN KIRKLAND

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

JUN 7 1967

Clerk

C. L. I.

Plaintiff's Attorney

Defendant's Attorney

N. F.

Defendant lives at
Loxley, Alabama

RECEIVED
Received in Office

JUN 8 1967 19.....

JAYLE WILKINS, Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned to my court after search and seizure.
By W. D. Wilkins, Sheriff
1967

Sheriff

Deputy Sheriff