

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 Albert Chaney and Lula Bell Chaney

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.....

..... Albert Chaney and Lula Bell Chaney, Defendant.....

by Atlantic Discount Corporation, Assignee of City Furniture Co. Inc

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

Witness my hand this..... 8th day of..... June 1967.....

..... Alice J. Luck Clerk

Ex-6-9-67

No. 2557

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ATLANTIC DISCOUNT CORPORATION

Assignee of City Furniture Co. Inc

Plaintiffs

vs.

Albert Chaney and Lula Bell Chaney

Defendants

who live at 408 ~~West~~

~~West~~ Minette, Alabama

SUMMONS AND COMPLAINT

Filed 19.....

JUN 8 1967

Clerk

WILLIAM J. DUCK, CLERK
REGISTERED

W. H. H. Brentley & Nesbit
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Rt. 1, Box 139, Daphne, Ala.
(near Malbis Courts)

RECEIVED
Received In Office

JUN 8 1967 19.....

TAYLOR WILKINS, Sheriff
SHERIFF

I have executed this summons

this June 9 1967

by leaving a copy with

Albert Chaney

Lula Bell Chaney

Daphne

Sheriff claims 108

Ten Cents per mile Total 10.80

TAYLOR WILKINS, Sheriff

BY

Roy Randal
Deputy Sheriff

Layton Wilkins

Sheriff

Roy Randal

Deputy Sheriff

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 Albert Chaney and Lula Bell Chaney

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.....

Albert Chaney and Lula Bell Chaney....., DefendantS.....

by Atlantic Discount Corporation, a Corporation, as Assignee of

City Furniture Company, Inc. a Corporation....., Plaintiff.....

Witness my hand this 13 day of Sept. 1947

Clifford J. Duck Clerk

Ex-9-15-67

No. 7557

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Atlantic Discount Corporation
a Corporation, as Assignee of
City Furniture Company, Inc.
a Corporation

Plaintiffs

vs.

Albert Chaney and Lula Bell
Chaney

Defendants

Amended
SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

SEP 13 1967

ALICE J. DECK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

By:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt 1 Box 139 Dothan Ala
Near Mills Court
Highway Rd
RECEIVED

Received In Office

SEP 13 1967 19.....

TAYLOR WILKINS..... Sheriff
SHERIFF

I have executed this summons

this *Sept 15* 19*67*

by leaving a copy with

Albert Chaney
and
Lula Bell Chaney
Sp. Inst.

Sheriff claims

Tax on claims

per mile

TAYLOR WILKINS, Sheriff

By *Roy Randell*

DEPUTY SHERIFF

Louie Wilkins Sheriff
Roy Randell Deputy Sheriff

ATLANTIC DISCOUNT CORPORATION,
A Corporation, as Assignee of
CITY FURNITURE COMPANY, INC.,
A Corporation,

Plaintiff,

vs.

ALBERT CHANEY AND LULA BELL
CHANEY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7557

The Plaintiff claims of the Defendants the sum of ONE HUNDRED TWENTY-NINE and 63/100 (\$129.63) DOLLARS due under written contract for the sale of merchandise between City Furniture Company, Inc., a corporation, and the Defendant dated the 11th day of November, 1965, which said contract has been assigned in writing to the Plaintiff herein. Plaintiff claims in addition to said sums a reasonable attorneys fee as provided in said contract. Plaintiff claims said sums with waiver of exemptions as provided in said contract.

WILTERS BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit
Attorneys for Plaintiff

FILED

JUN 8 1967

ALICE L. DICK, CLERK
REGISTER

ATLANTIC DISCOUNT CORPORATION, I

a Corporation, as Assignee of
CITY FURNITURE COMPANY, INC. I
A CORPORATION,

Plaintiff

vs I

ALBERT CHANEY AND LULA BELL
CHANEY, I

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 7557

Comes now the Plaintiff in the above styled cuase and amends its bill of complaint to read as follows:

1. The Plaintiff claims of the Defendants the sum of THREE HUNDRED FORTY EIGHT and 64/100 (\$348.64) DOLLARS due under written contract for the sale of merchandise between City Furniture Company, Inc., a Corporation, and the Defendants dated the 11th day of November, 1965, which said contract has been assigned in writing to the Plaintiff herein.
2. The Plaintiff claims in addition to said sums a reasonable attorneys fee as provided in said contract. Plaintiff claims said sums with waiver of exemptions as provided in said contract.

WILTERS, BRANTLEY & NESBIT

By: Thurston J. Nesbit

Attorneys for Plaintiff

FILED

SEP 13 1967

WILTERS, BRANTLEY & NESBIT

CLERK
REGISTER