

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

Plaintiff,

vs.

ALGIN B. SANKS, and BEULAH SANKS

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7539

Plaintiff claims of the Defendants the sum of ONE
HUNDRED NINETY-FIVE and 00/100 (\$195.00) DOLLARS due under
written contract for the sale of merchandise between City
Furniture Company, Inc., a corporation, and the Defendant dated
the 10th day of September, 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 J. Nesbit

Defendants may be served at Rt. 2, Box 106, Bay Minette, Alabama.

FILED

JUN 8 1967

ALICE L. DICK, CLERK
REGISTER

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 Algin B. Sanks and Beulah Sanks

.....
.....
.....

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.....

..... Algin B. Sanks and Beulah Sanks Defendant.....

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

..... Plaintiff.....

Witness my hand this..... day of..... 19.....

..... Clerk

EX-6-12-67

No. 2559

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ATLANTIC DISCOUNT CORPORATION
Assignee of City Furniture Co.
Inc.

Plaintiffs

vs.

Algin B. Sanks and Beulah Sanks
Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

JUN 8 1967

Clerk

ALICE I. BUCK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

JUN 8 1967 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this June 1, 2 1967
by leaving a copy with

10 miles as
100
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

Taylor Wilkins, Sheriff
W. A. Tolbert, Deputy Sheriff

10 miles north of D. 14

ATLANTIC DISCOUNT CORPORATION,
a corporation, as Assignee of
CITY FURNITURE COMPANY, INC.,
a corporation

Plaintiff

vs

ALGIN B. SANKS and BEULAH SANKS

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7559

Come the defendants in the above styled cause and demur to the
complaint filed in said cause and to each phase thereof, as
follows:

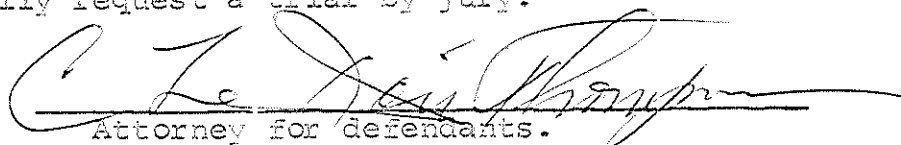
1. Said plaintiff fails to allege the contents of said
written contract or attach a copy thereof to the complaint filed
herein.

2. Said plaintiff fails to allege the contents of the
assignment of the alleged contract or attach a copy of said
assignment.

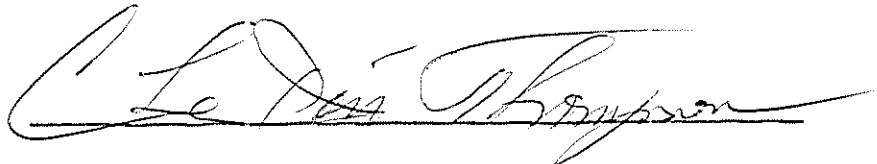
3. Said complaint fails to state a cause of action.


Attorney for defendants.

Defendants respectfully request a trial by jury.


Attorney for defendants.

I hereby certify that I have this 7th day of July, 1967,
mailed a copy of the foregoing demurrers to Honorable Phyllis
S. Nesbit, by depositing a copy of same in the U. S. Mail,
postage prepaid, properly addressed to her office in
Robertsdale, Alabama.



FILED

JUL 7 1967

ALEX L. DUCK, CLERK
REGISTERED