

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON

December 19, 1968

TELEPHONE 937-2191

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Re: Case Number 7569
State Farm Mutual Insurance Co.
vs.

Dyess

On September 21, 1967 we recovered a judgment in the above suit in the sum of \$3,439.00 debt and \$26.00 cost. You issued an execution, but the Sheriff was unable to collect. Mr. Dyess first paid \$60.00 on the judgment, and on September 7, 1968 he paid \$200.00, leaving a balance of \$3,351.00 and \$28.00 Court costs.

Will you please issue an execution for such amount and turn it over to the Sheriff for collection.

With best regards,

Yours very truly,

CHASON, STONE & CHASON

By: 

JC:js

CC: State Farm Mutual Insurance Company
P. O. Box 9068
Mobile, Alabama 36609

Sheriff Taylor Wilkins
Bay Minette, Alabama 36507

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, A Cor-
poration,

Plaintiff

VS.

RONNIE E. DYESS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7569

PLEAS

1.

Not guilty.

2.

There was no consideration flowing from the Plaintiff to the
Defendant for this note.

WILTERS & BRANTLEY

BY: Lochen M Brantley
Attorney for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: Lochen M Brantley
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have on this 16 day of June
(1967) served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By: Lochen M Brantley

FILED

JUN 16 1967

WILTERS & BRANTLEY, CLERK
REGISTER

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, A Cor-
poration,

Plaintiff,

Vs.

RONNIE F. DYESS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7569

* * * PLEA

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette
Alabama

FILED

JUN 16 1975

WILLIAM L. DUCK, CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ronnie F. Dyess to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of State Farm Mutual Automobile Insurance Company, a corporation.

Witness my hand this 13th day of June, 1967.

Alice J. Duck
Clerk

STATE FARM MUTUAL AUTOMOBILE X
INSURANCE COMPANY, A Cor- X
poration, X

Plaintiff, X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs.

AT LAW

RONNIE F. DYESS, X

Defendant. X

7569

COUNT ONE:

The Plaintiff claims of the Defendant Three Thousand and Sixty-four Dollars (\$3,064.00), due by promissory note made by him on the 25th day of October, 1966, and payable in monthly installments of Twenty Dollars (\$20.00) per month beginning November 1, 1966, with interest thereon, which note provides that upon failure to pay any payment on the due date the entire note shall become due and payable upon demand and the Plaintiff avers that no monthly payments have been made and that demand for payment in full has been made upon the Defendant.

The Plaintiff alleges that in, by and as a part of said note, the Defendant waived all right of exemption under the Constitution and law of the State of Alabama, of any other State and of this Waiver the Plaintiff now claims the benefit.

The Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure the debt secured by said note including a reasonable attorney's fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Seven Hundred and Fifty Dollars (\$750.00) as such reasonable attorney's fee.


Attorneys for Plaintiff

FILED
JUN 13 1961
ALICE L. WICK, CLERK
REGISTERED

7569

Received 13 day of June 1967
and on 14 day of June 1967
I received a copy of the within 8 & C
on Ronnie F. Dyess

By service on _____

TAYLOR WILKINS, Sheriff
By W A Talbert
om:

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, A Corporation,

Plaintiff,

VS.

RONNIE F. DYESS,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

JUN 13 1967

Alice E. Duck, CLERK
REGISTERED

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA