

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

Plaintiff,

vs.

JAMES COX,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2581

Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-EIGHT and 45/100 (\$128.45) DOLLARS due under written contract for the sale of merchandise between the City Furniture Company, Inc., a corporation and the Defendant which said contract has been assigned in writing to the Plaintiff herein. The Plaintiff avers that the said contract has been lost or destroyed by accident and said contract contained a waiver of exemptions of personal property under the laws and constitutions of the State of Alabama and the said contract provided for the payment to the Plaintiff by the Defendant of a reasonable attorneys fee in the event of default of said contract and that contract has been lost or destroyed by accident that has not been paid or otherwise discharged. An affidavit of C. M. Brogdon, Manager of Atlantic Discount Corporation is attached and made a part of this pleading as if fully set out herein. The Plaintiff claims a reasonable attorneys fee of \$25.00 as provided in said contract. The Plaintiff claims said sums with waiver of exemptions as provided in said contract.

WILTERS, BRANTLEY & NESBIT

BY: Thylio S. Nesbit

FILED

JUN 22 1937

MADE A DICK, CLERK  
REGISTER

ATLANTIC DISCOUNT CORPORATION  
A Corporation, as Assignee of  
City Furniture Company, Inc.,  
A Corporation,

Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, NO. \_\_\_\_\_

James<sup>VS</sup> Cox

STATE OF ALABAMA )

COUNTY OF

Before me, the undersigned, a Notary Public in and for said State and County, personally appeared C. M. Brogdon, who being duly sworn by me, does depose and say that he is the Manager of Atlantic Discount Corporation in the case of Atlantic Discount Corporation, a corporation, as assignee of City Furniture Company, Inc., a corporation, against JAMES COX which is a suit brought on a written contract which said contract has been assigned in writing to Atlantic Discount Corporation, a corporation, by City Furniture Company, Inc., a corporation, but that said contract has been lost or destroyed by accident and said contract contained a waiver of exemptions of personal property under the laws and constitutions of the State of Alabama and the said contract provided for the payment to the Plaintiff by the Defendant of a reasonable attorneys fee in the event of default of said contract and that contract has been lost or destroyed by accident that has not been paid or otherwise discharged.

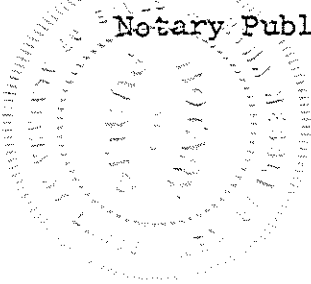
C. M. Brogdon  
C. M. Brogdon

Subscribed and sworn to before me

this 9th day of June, 1967.

Martha A. Kern

Notary Public, State of Alabama at Large



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 Cox.....

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 Cox....., Defendant.....

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

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

Witness my hand this.....22.....day of.....June.....1967.....

Executed 6-27-67  
Layton Wilkins Jr.  
WA Albert D.S.

.....Alice J. Duck.....Clerk

No. 7581

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ATLANTIC DISCOUNT CORPORATION  
Assignee of City Furniture Co. Inc.

Plaintiffs

vs.

JAMES COX

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

JUN 22 1967

Clerk

ALICE L. DICK, CLERK  
REGISTERED

Winters Brantley & Nebbit  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

409 W. Hurricane Rd.  
Bay Minette, Alabama

draws

RECEIVED  
Received In Office

JUN 22 1967 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this

22 June 1967

by leaving a copy with

James Cox

4  
Sum Costs per min. Total \$ 1.40  
TAYLOR WILKINS, SHERIFF  
By W. A. Nebbit  
DEPUTY SHERIFF

Taylor Wilkins Sheriff  
W. A. Nebbit Deputy Sheriff

D-Well