

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

Plaintiff,

vs.

NORMAN JACKSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7582

Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY-SEVEN and 46/100 (\$157.46) 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 \$35.00 as provided in said contract. The Plaintiff claims said sums with waiver of exemptions as provided in said contract.

FILED

JUN 22 1927

ALICE I. DICK, CLERK
REGISTER

WILTERS, BRANTLEY & MESBIT

BY: Thos. S. Mesbit

ATLANTIC DISCOUNT CORPORATION
A Corporation, As Assignee of
City Furniture Company, A
Corporation

Plaintiff, I=

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs.

NORMAN JACKSON

AT LAW

NO _____

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 NORMAN JACKSON 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.

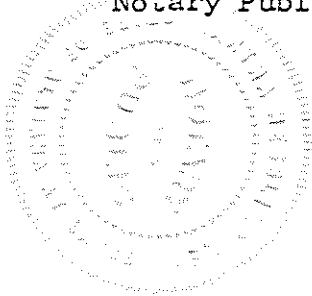
C. M. Brogdon
C. M. Brogdon

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 SummonNorman Jackson.....

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.....

.....Norman Jackson....., Defendant.....

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

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

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

Executed 7-3-67
Tayler Wilkins D
Ray Randall D.S.
Alice J. Luck Clerk

Try Daphne - he did
No. 7582 *work for Campbell* Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Atlantic Discount Corporation
Assignee of City Furniture Co.
Inc.
Plaintiffs

vs.

Norman Jackson
Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

JUN 22 1967

Clerk

WILLIAM BRANTLEY
CLERK
REGISTER

William Brantley
& Nesbit
Plaintiff's Attorney

Defendant's Attorney

Back in Daphne

Defendant lives at

who lives at Rt. 2 Box 112
Daphne, Ala. works for Bill
Camel, Robertsdale, Ala.

Received In Office

RECEIVED

19.....

JUN 22 1967

Sheriff

I have executed this summons

TAYLOR WILKINS
SHERIFF

this *July 3* 19*67*

by leaving a copy with

Norman Jackson

Belfair

Sheriff claims 30 miles at

Ten Cents per mile Total \$ 3.00

TAYLOR WILKINS, Sheriff

BY *RR*
DEPUTY SHERIFF

Joseph Wilkins Sheriff
Raymond P. Poff Deputy Sheriff