

ATLANTIC DISCOUNT CORPORATION,
A CORPORATION, AS ASSIGNEE OF
CITY FURNITURE COMPANY, INC.,
A CORPORATION,

Plaintiff,

vs.

AUBREY STANTON, JR.,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2558

Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTEEN and 00/100 (\$215.00) DOLLARS due under written contract for the sale of merchandise between the City Furniture Company, Inc., a corporation and the Defendant dated the 19th day of December, 1964, 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 as provided in said contract. The Plaintiff claims said sums with waiver of exemptions as provided in said contract.

WILTERS, BRANTLEY & NESBIT

FILED

JUN 8 1967

ALICE J. DUCK, CLERK
REGISTER

BY

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

Plaintiff

vs

AUBREY STANTON, JR.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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
first 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 *AUBREY STANTON* 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 con-
stitutions 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,

1 day of *June*, 1937.

William C. Root
Notary Public, State of Alabama at Large

FILED

JUN 8 1937

WILLIAM C. DICK, CLERK
BALDWIN COUNTY

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 Aubrey Stanton, Jr.

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.....

Aubrey Stanton, Jr., Defendant.....

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

Witness my hand this 8th day of June 1967

executed 6-12-67
Taylor Wilkins Jr
Roy Randall D.S.

Alice J. Duck Clerk

No. 7558

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ATLANTIC DISCOUNT CORPORATION
ASSIGNEE OF CITY FURNITURE CO;
INC.

Plaintiffs

vs.

AUBREY STANTON, JR.

Defendants

SUMMONS AND COMPLAINT

Filed JUN 8 1967 19.....

Clerk

ALICE J. DICK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 1, Box 124, Daphne, Ala.

RECEIVED
Received In Office

JUN 8 1967 19.....

TAYLOR WILKINS, Sheriff

SHERIFF

I have executed this summons

this June 12 1967

by leaving a copy with

Aubrey Stanton Jr.

Aubrey Stanton Jr.

Belfort

Distance 5.0 miles at

Van Court per mile: Total \$5.80

TAYLOR WILKINS, Sheriff

by Roy Randall
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff