

U.S.F.&G. COMPANY, INC.,)	IN THE CIRCUIT COURT OF BALDWIN
A Corporation,)	COUNTY, ALABAMA
Plaintiff,)	
VS.)	AT LAW
M. L. VINSON,)	
Defendant.)	CASE NO. <u>7816</u>

COUNT ONE

Plaintiff claims of the defendant, the sum of to-wit, SIX HUNDRED DOLLARS (\$600.00) the balance due on a note drawn by him on to-wit, the 20th day of September, 1965 payable to plaintiff in monthly installments of FORTY DOLLARS (\$40.00) each. Plaintiff alleges that default has been made in the payment of said indebtedness. Plaintiff further avers that in said note and as a part of the consideration thereof the defendant waived demand, presentment, protest, notice of protest, and right of exemption under the constitution and laws of Alabama.

Plaintiff further alleges that in said note and as a part of the consideration thereof the defendant agreed to pay all costs of collecting this note including a reasonable attorney's fee.

WHEREFORE, the plaintiff claims of the defendant the sum of SIX HUNDRED DOLLARS (\$600.00), together with interest thereon and a reasonable attorney's fee.

LYONS, PIPES AND COOK
Attorneys for Plaintiff.

Defendant may be
served as follows:

By: Augustine Meaher III
Augustine Meaher, III

Mr. M. L. Vinson
Bay Minette, Alabama

FILED

Nov 2 1965

CLERK OF COURT

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7816

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon M. L. Vinson

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.....

M. L. Vinson

Defendant.....

by

U. S. F. & G. COMPANY, INC., A Corporation

Plaintiff.....

Witness my hand this 2nd day of November 1967

Ex-11-6-67

Cliff J. Luck Clerk

No. 7816

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

U. S. F. & G. COMPANY, INC.,
A Corporation

Plaintiffs

vs.

M. L. VINSON,
Defendants

SUMMONS AND COMPLAINT

Filed November 2, 1967

Alice J. Duck Clerk

Lyons, Pipes & Cook
P. O. Drawer 252
Mobile, Alabama 36601

Plaintiff's Attorney
Defendant's Attorney

Defendant lives at

Received in Office
RECEIVED

NOV 2 1967

TAYLOR WILKINS, Sheriff

I have executed this summons

this Nov 6 1967

by leaving a copy with

M. L. Vinson

Sherry claims 20
Non Contempt Total 200
TAYLOR WILKINS
W. A. Talbert
DEPUTY SHERIFF

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

White house Fork

LYONS, PIPES and COOK
ATTORNEYS-AT-LAW
2510 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA 36601

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
GORDON B. KAHN
IRWIN W. COLEMAN, JR.
G. SAGE LYONS
AUGUSTINE MEAHER, III
JAMES B. KIERCE, JR.
WES PIPES

AREA CODE 205
TELEPHONE 432-4483
P. O. DRAWER 2525

December 12, 1967

Mr. M. L. Vinson
Route 1, Box 240
Bay Minette, Alabama

Re: U.S. Fidelity & Guaranty Company vs. M. L. Vinson

Dear Mr. Vinson:

We are in receipt of your letter of December 5, 1967. Our records indicate that on September 20, 1965 you executed a promissory note in the amount of \$1,000.00 plus interest payable to the plaintiff. Your letter indicates that you have receipts showing payments of approximately \$400.00 on this indebtedness; your figures are approximately correct. You will note that our suit claims \$600.00 as the balance due on this note and we trust that you can readily understand that this represents the outstanding balance on the note of September 20, 1965.

As you are well aware, a law suit has been filed on this note. As you are likewise aware the suit claims the principal balance plus interest plus attorney's fees all as provided by in your note. Your letter of December 5, 1967 does not constitute a proper pleading. You will probably want to confer with your attorney who will file pleadings in your behalf and who could protect your interest in this law suit. We would be happy to hear from your legal representative in this matter so that your indebtedness could be paid.

Yours very truly,

LYONS, PIPES AND COOK

Augustine Meaher, III

AM/bn

cc: Mrs. Alice Duck
Clerk of Baldwin County Circuit Court
Case No. 7816

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

36601

AREA CODE 205
TEL. 432-4483
P.O. DRAWER 2525

SAM W. PIPES, III

WALTER M. COOK

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

October 30, 1967

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED.

Mrs. Alice Duck
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: U.S.F.&G. Company vs. M. L. Vinson

7816

Dear Mrs. Duck:

We enclose the Complaint in the above suit and ask
that it be filed in your Court. Please advise us
when the defendant is served.

Very truly yours,

LYONS, PIPES AND COOK

Augustine Meaher III

Augustine Meaher, III

AM/bn

Enclosures