

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 RAYMOND C. ADAMS and EMMA ADAMS 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 GEORGE B. HALLIDAY, individually and doing business as MATTIE L. RHODES HOSPITAL.

Witness my hand this 25 day of January, 1968.

B. L. Muck
Clerk

GEORGE B. HALLIDAY, individually	X	
and doing business as MATTIE L.		
RHODES HOSPITAL,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
		BALDWIN COUNTY, ALABAMA
vs.	X	
RAYMOND C. ADAMS and EMMA	X	AT LAW
ADAMS,		
	X	707962
Defendants.	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Thirty Five Dollars and Sixty Cents (\$235.60) due by Promissory Note made by them on the 15th day of July, 1966 and payable on the 15th day of August, 1966, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note, the Defendants agreed to pay all costs of collecting, or

securing or attempting to collect or secure 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 Defendants the further and additional sum of Fifty Dollars (\$50.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendants waive as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to personal property, and the Plaintiff claims the benefit of such waiver.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of Two Hundred Four Dollars and Twenty Cents (\$204.20) due from them by account on the 1st day of May, 1967, which sum of money with the interest thereon, is still unpaid.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED

JAN 25 1968

ALICE J. 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 RAYMOND C. ADAMS and EMMA ADAMS 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 GEORGE B. HALLIDAY, individually and doing business as MATTIE L. RHODES HOSPITAL.

Witness my hand this 7th day of January, 1968.

Heidi M. Smith
Clerk

GEORGE B. HALLIDAY, individually	X	
and doing business as MATTIE L.		
RHODES HOSPITAL,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	
RAYMOND C. ADAMS and EMMA	X	AT LAW
ADAMS,		
	X	<i>760 996 Z</i>
Defendants.	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Thirty Five Dollars and Sixty Cents (\$235.60) due by Promissory Note made by them on the 15th day of July, 1966 and payable on the 15th day of August, 1966, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note, the Defendants agreed to pay all costs of collecting, or

securing or attempting to collect or secure 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 Defendants the further and additional sum of Fifty Dollars (\$50.00) as such reasonable attorney's fee.

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CHASON, STONE & CHASON

By: 

Attorneys for Plaintiff

FILED

JAN 25 1968

ALICE J. 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 RAYMOND C. ADAMS and EMMA ADAMS 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 GEORGE B. HALLIDAY, individually and doing business as MATTIE L. RHODES HOSPITAL.

Witness my hand this 17th day of January, 1968.

[Signature]
Clerk

GEORGE B. HALLIDAY, individually	X	
and doing business as MATTIE L.		
RHODES HOSPITAL,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	
RAYMOND C. ADAMS and EMMA	X	AT LAW
ADAMS,		
	X	7966
Defendants.	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Thirty Five Dollars and Sixty Cents (\$235.60) due by Promissory Note made by them on the 15th day of July, 1966 and payable on the 15th day of August, 1966, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note, the Defendants agreed to pay all costs of collecting, or

securing or attempting to collect or secure 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 Defendants the further and additional sum of Fifty Dollars (\$50.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendants waive as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to personal property, and the Plaintiff claims the benefit of such waiver.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of Two Hundred Four Dollars and Twenty Cents (\$204.20) due from them by account on the 1st day of May, 1967, which sum of money with the interest thereon, is still unpaid.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED

JAN 25 1968

ALICE J. DUCK CLERK
REGISTER

Mr. 7966

Returned 25 day of Jan 1968
Served on Raymond Adams
Emma Adams

TAYLOR WILKINS, Sheriff
By D. S.

Returned 6 day of Feb 1968
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By W. A. Adams
Deputy Sheriff

GEORGE B. HALLIDAY, individually
and doing business as MATTIE L.
RHODES HOSPITAL,

Plaintiff,

VS.

RAYMOND C. ADAMS and EMMA
ADAMS,

Five in Mobile
Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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ADDRESS OF DEFENDANTS:

Box 704
Bay Minette, Alabama

* * * * *

JAN 25 1968

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