## OWENS & PATTON ATTORNEYS AT LAW

J. CONNOR OWENS, JR.
DAHLBERG BUILDING
P. O. BOX 729
BAY MINETTE, ALABAMA 36507
TELEPHONE NO. 937-4661
AREA CODE 205

April 29, 1968

WALTER S. PATTON. III 302 DE LA MARE STREET FAIRHOPE. ALABAMA 36532 TELEPHONE NO. 928-9881 AREA CODE 205

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

Dear Mrs. Duck:

Re: F N B of Fairhope vs. Whitfield

Enclosed is complaint and copy thereof of the above styled suit. I would appreciate your attaching a summons and forwarding it to the Sheriff's office for service. The defendant lives at Lake Forest in Spanish Fort. His mailing address is 105 D'Olive, Daphne, Alabama. It is my understanding that his house is the first house on the left as you enter the main entrance of Lake Forest.

I am enclosing a copy of this letter in case you want to hand it to the Sheriff's office for the purpose of giving them this address. Thank you for your aid and consideration in this matter.

Sincerely,

Walter S. Patton

WSP/mag

FIRST NATIONAL BANK OF FAIRHOPE, A NATIONAL BANKING ASSOCIATION

Plaintiff

vs.

DON WHITFIELD

Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

8114

## COMPLAINT

The Plaintiff claims of the Defendant FOUR HUNDRED SIXTY THREE AND 74/100 (\$463.74) DOLLARS, this amount being the unpaid balance due by a promissory note made by the defendant on, to-wit, May 16, 1966, in the face of ONE THOUSAND ONE HUNDRED SEVENTY AND 50/100 (\$1,170.50) DOLLARS and payable in monthly installments with a provision that in case of any default in payments the entire balance of said note would become immediately due and payable, at the option of the holder, which said unpaid balance became due and payable on, to-wit, July 5, 1967, by wirtue of default in said installment payments, and plaintiff also claims interest thereon as provided by said note.

Plaintiff further avers that by the terms of said note, the defendant agreed to pay a reasonable attorney's fee in the event said note was placed in the hands of an attorney for collection, and the plaintiff claims the benefit thereof.

Plaintiff further avers that by the terms of said note defendant waived and renounced, for himself and his family any homestead or exemption rights that they might have by virtue of the constitution or laws of Alabama, or any other state of the United States, as against said debt, and waived exemption of all kinds under proceedings in bankruptsy, and plaintiff claims the benefit thereof.

APR 3 0 1968

Walter S. Patton, Attorney for Plaintiff

AND J. DUN CLERK REGISTER

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STATE OF ALABAMA  Baldwin County	Circuit Court, Baldwin County No8114	
	TERM, 19	9
T	O ANY SHERIFF OF THE STATE OF ALABAMA:	
	Don Whitfield	
You Are Hereby Commanded to Summon	n Don whitelield	•••••
		•
		*******
• •	r, within thirty days from the service hereof, to the compaty, State of Alabama, at Bay Minette, against	
Don Whitfield		
hy First National Bank of Fairho	ope, a National Banking Association	*****
	Plaintif	
Witness my hand this 30th	day of April 19.68	

No8114	Page
STATE OF	ALABAMA
Baldwin	County
CIRCUIT	COURT
IRSTnationalbai	nkoffairhope,
. National Banking	gAssoc.iation Plaintiffs
v	s,
DON WHITFIELD	Defendants
SUMMONS AN	D COMPLAINT
Filed	1968
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Received In Office APR 3 0 1968 I have executed this summons by leaving a copy with TAYLOW WILKINS; SHERIFF OF BALDWIN COLINITY, ALABAMA; CLAIM \$7.50

Defendant lives at

Plaintiff's Attorney