STATE OF ALABAMA, )
COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon W. F. ANDERSON 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 W. F. ANDERSON, Defendant, by HUBBARD PANTS COMPANY, a Corporation, Plaintiff.

	WI TNESS	my hand	this 5	_day of
		v		
	j.			
				little - 1 hours to
	:			ALICE J. DUCK, Clerk of the Circuit Court.
	2714	1.7		and the second of the second
	0	· ·		Circuit Court,
-7				
4, 4	3.7			

HUBBARD PANTS COMPANY,	X
a Corporation,	IN THE CIRCUIT COURT OF
Plaintiff,	X BALDWIN COUNTY, ALABAMA,
VS.	X AT LAW.
W. F. ANDERSON,	x #8208
Defendant.	X

## COMPLAINT

## Count One

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FOURTEEN AND 50/100 (\$114.50) DOLLARS due by promissory note for ONE THOUSAND TWENTY-FIVE AND NO/100 (\$1,025.00) DOLLARS made by him on, towit, the 16th day of November, 1966, together with interest at six per cent per annum, after maturity, and said note was payable on the 31st day of December, 1966; and the Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant has expressly waived his right to claim personal property as exempt to him under the Constitution and laws of the State of Alabama, and agreed to pay an attorney's fee for the collection thereof, and the Plaintiff hereby claims the further sum of ONE INTERN AND NO/100 (\$100.00) DOLLARS as such attorney's fee.

JUL 8 1968

ALGE J. DUCK CLERK REGISTER

E. G. RICKARBY, Attorney for Plaintiff.

Defendant lives at 115 West Laurel Street, Foley, Alabama and can be reached on the week-ends.

eceived Jay of July 9 18

Ind on 7 day of Cucquist 1968

served a copy of the within 22

I Service on Reserved

FAYLOR WILKINS, Streniff

By M. Edollum O. S.

 CASE NO. 8208 CIVIL

HUBBARD PANTS COMPANY, A Corporation

VS.

W. F. ANDERSON

E.G. Rickarby

Law Offices

Your File No. .....

E. G. RICKARBY 35 SOUTH SECTION STREET FAIRHOPE, ALABAMA 36532 CODE 205 Telephone: 928-9836

Mailing Address P. O. BOX 471

September 13, 1968 Case No. 8208

Hon. Telfair Mashburn, Circuit Judge Bay Minette, Alabama 36507

Dear Sir:

Inre: Hubbard Pants Co. vs. William P. Anderson

Request judgment by default on promissory note against Mr. William F. Anderson for \$114.56 principle and \$25.00 attorneys fee with waiver of exemption. Am enclosing note.

Respectfully submitted,

EGR/hw

cc: Mr. Kahn

915 Olive Street

St. Louis, Mo. 63101

			P = 1
\$1,0	25.00	\$1,025.00	Foley, Ala. November 16, 1966
		On or before December 31	1966 after date, without grace I promise to pay
		to the order of HUBBARD PANT	S COMP ANY
		ONE THOUSAND TWENTY-FIVE	& 00/100(\$1025,00)-Dollars
		until paid. law or	ffice of E.G.RICKARBY, ESQ, Fairhope, Ala.
		The parties to this instrument, whether me this note and vaives as to this debt, or any rene other State, as to personal property and they e or secure this note, including a reasonable attorendorser, surety or guarantor, of this note sevements necessary to hold them, and they agree to	maker, endorser, surety or guarantor, each for himself, hereby severally agrees to pay ewal thereof, all right to exemption under the constitution and laws of Alabama, or any each severally agree to pay all costs of collecting or securing, or attempting to collect rney's fee, whether the same be collected or secured by suit or otherwise, and maker, erally waives demand, presentment, protest, notice of protest, suit and all other requirethat time of payment may be extended without notice to them of such extension. The supplying of a payle on or after maturity to the payment of this debtary find of its said.
No.		Due December 31, 1966	W. F. Anderson Seal
110		Due December 51, 1900	Foley, Alabama 36535 Seal