

MERIT FINANCE COMPANY, a
corporation,

Plaintiff,

vs.

RUDOLPH P. BYRNE, and CHRISTINE
H. BYRNE, jointly and severally, (

Defendants. (

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

CASE NO. 8367

Plaintiff claims of the defendants, jointly and severally, the sum of \$175.33 for that heretofore on to-wit: December 23, 1965, the defendants executed a wirtten promissory note wherein the defendants agreed to pay Merit Finance Company, a corporation, the sum of \$423.25 in installments of \$16.93 per month, including interest, commencing on to-wit: January 23, 1966. Plaintiff avers that defendants defaulted in payment thereunder onto-wit: June 6, 1968, and pursuant to the terms of said promissory note the defendants signed, the plaintiff herein has declared the entire balance due and owing.

Plaintiff avers that by the terms of said note the defendants waived all rights or claim of exemption under the Constitution and Laws of the State of Alabama and agreed to pay a reasonable attorney's fee in the event employment an attorney was necessary for collection, which said attorney's fee plaintiff claims in the amount of \$43.83, which is one-third of \$131.50.

WHEREFORE, plaintiff claims of the defendants, \$175.33, plus interest.

PERLOFF & REID

Dr. [Signature]
Attorney for Plaintiff

Defendants may be served:

His Emp: Ponderosa Restaurant

Her Emp: Thomas Hospital, Fairhope, Ala.

131.50
35
166.50

FILED

OCT 12 1968

ALICE J. DUCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8367.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA;

You Are Hereby Commanded to Summon ...RUDOLPH P. BYRNE and CHRISTINE H. BYRNE,
.....jointly and severally,.....
.....
.....

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.....them.....

....., Defendant..S...

byMerit Finance Company, a corporation,.....

....., Plaintiff.....

Witness my hand this.....17.....day of.....Oct.....1968
.....William J. Kuch.....Clerk

10/17/68

No. 8347

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Merit Finance Company,

a corporation,

Plaintiffs

vs.

Rudolph P. Byrne and

Christine Byrne Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

OCT 12 1968

ALICE J. DUCK

CLERK
REGISTER

PERLOFF & REID, 205 Van Antwerp
Building, Mobile Plaintiff's Attorney

Defendant's Attorney

Defendant lives at Daphne,
Alabama, Emp: Ponderosa Rest-
aurant and she at Thomas
Hospital in Fairhope, Ala.

RECEIVED

OCT 12 1968 19.....

~~WILKINS~~ Sheriff

I have executed this summons

this Oct 17 1968

by leaving a copy with

Rudolph P. Byrne

Christine Byrne
Daphne

Sheriff claims 10.8 miles at

Ten Cents per mile Total \$ 1.080

TAYLOR WILKINS, Sheriff

BY

Roy Randall
DEPUTY SHERIFF

Layla Wilkins
Roy Randall

Sheriff

Deputy Sheriff