

COLLINS, GALLOWAY & MURPHY
ATTORNEYS AT LAW
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FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924-1956)
JAMES H. LACKEY

P. O. BOX 4492
TELEPHONE
432-0568
AREA CODE 205

October 21, 1968

Clerk of Circuit Court
Baldwin County Court House
Bay Minette, Alabama

Re: The American Road Insurance Co.
vs: Simon Hadley
Our File 1404-S

8391

Dear Sir:

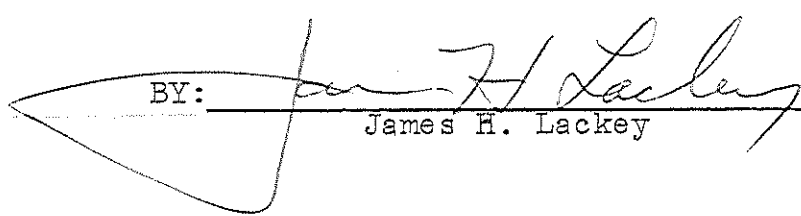
You will find enclosed a copy of a complaint in the above styled matter. Would you please file same and notify us that this has been done.

Thank you very much.

Sincerely,

COLLINS, GALLOWAY & MURPHY

BY:


James H. Lackey

JHL/mle

encl.

THE AMERICAN ROAD INSURANCE
COMPANY, a corporation,

Plaintiff,

VS.

SIMON HADLEY,

Defendant.


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
NO. 8391

PLEA

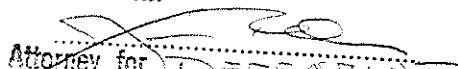
Now comes the defendant in the above styled cause and for
plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.


Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 5th day
of Nov., 1968.


Attorney for DEFENDANT

FILED

NOV 6 1968

ALICE J. DUCK

CLERK
REGISTER

THE AMERICAN ROAD INSURANCE
COMPANY, A Corporation,

Plaintiff,

VS:

SIMON HADLEY,

Defendant.

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

*

*

CASE NO.

8291

The Plaintiff claims of the Defendant THREE HUNDRED NINETY AND 03/100 (\$390.03) DOLLARS due from him by promissory note made by him on, to-wit, June 2, 1968, whereby the Defendant promised to pay to the Plaintiff the total sum of THREE HUNDRED NINETY AND 03/100 (\$390.03) DOLLARS, in installments of TWENTY AND 00/100 (\$20.00) DOLLARS, the first installment due on July 1, 1968, and a like installment on the first day of each month thereafter until fully paid.

Said note provided that in the event of default in payment of any installment when due, the entire principal balance then remaining would immediately become due and payable, and the Defendant defaulted on the first installment.

Plaintiff further claims a reasonable attorney's fee as provided in said note, in the amount of fifteen (15) per cent of the principal balance, as provided in said note, which said attorney's fee would be FIFTY EIGHT AND 50 (\$58.50) DOLLARS.

Wherefore, Plaintiff claims total judgment against the Defendant in the amount of FOUR HUNDRED FORTY EIGHT AND 53/100 (\$448.53) DOLLARS.

COLLINS, GALLOWAY & MURPHY

BY:

James H. Lackey
ATTORNEYS FOR PLAINTIFF

Defendant's Address:

Star Route Box 380

Bay Minette, Alabama

FILED

OCT 23 1968

ALICE J. 2832

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8391

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SIMON HADLEY

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

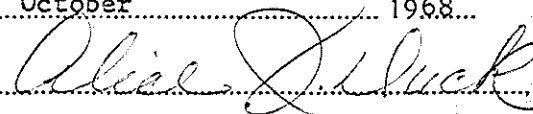
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

SIMON HADLEY, Defendant.....

by THE AMERICAN ROAD INSURANCE COMPANY, A Corp.

Plaintiff.....

Witness my hand this 23rd day of October 1968...

 Clerk

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No. 8391

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THE AMERICAN ROAD INSURANCE COMPANY,

A Corporation

Plaintiffs

vs.

SIMON HADLEY

Defendants

SUMMONS AND COMPLAINT

Filed Oct, 23, 19 68

Alice J. Duck Clerk

COLLINS, GALLOWAY & MURPHY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Star Route, Box 380
Bay Minette, Alabama

Received In Office

RECEIVED

OCT 23 1963

19.....

Sheriff

I have executed with summons

this 19 68

by leaving a copy with

Sheriff claims 23 miles at

Ten Cents per mile Total \$ 2.30

TAYLOR, WILKINS, Sheriff

BY Deputy Sheriff

DEPUTY SHERIFF

Taylor Wilkins, Sheriff

W.O. Gamm, Deputy Sheriff

Stahon