

INTERSTATE SECURITIES COMPANY
OF ALABAMA,

PLAINTIFF,

VS.

ALGIN B. SANKS,

DEFENDANT.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

: AT LAW

:

:

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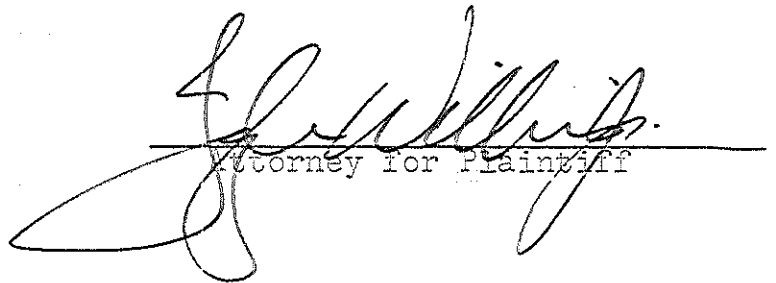
NUMBER: 8840

* * * * *

I.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SEVEN HUNDRED SEVENTY and 60/100 (\$1770.60) DOLLARS as balance due on a note for ONE THOUSAND EIGHT HUNDRED TWENTY-TWO and 80/100 (\$1822.80) DOLLARS made by him on the 29th day of April, 1968, and payable on the 12th day of November, 1968, with interest thereon.

The note contains provision for a reasonable attorney's fee and waiver of exemption whereof Plaintiff claims benefit.


Attorney for Plaintiff

FILED

AUG 13 1969

ALICE J. DUCK

CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NUMBER: _____

INTERSTATE SECURITIES
COMPANY OF ALABAMA,

PLAINTIFF,

VS.

ALGIN B. SANKS,

DEFENDANT.

TAYLOR WILKINS, JR.
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALGIN B. SANKS

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.....

ALGIN B. SANKS Defendant.....

by INTERSTATE SECURITIES COMPANY OF ALABAMA

Plaintiff.....

Witness my hand this.....day of..... 19.....

..... Clerk

4-8-15-69

No. 8840

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

INTERSTATE SECURITIES

COMPANY OF ALABAMA

Plaintiffs

vs.

ALGIN B. SANKS

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

AUG 13 1969 Clerk

ALICE J. DUCK

CLERK
REGISTER

TAYLOR D. WILKINS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

AUG 13 1969

19.....

~~MISSISSIPPI~~

~~MISSISSIPPI~~

Sheriff

I have executed this summons

this Aug 15 1969

by leaving a copy with

Algin B. Sanks

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY Albert

Taylor Wilkins Sheriff

W. A. Albert Deputy Sheriff

Degas 70

INTERSTATE SECURITIES
COMPANY OF ALABAMA

Plaintiff

vs

ALGIN B. SANKS

Defendant

* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

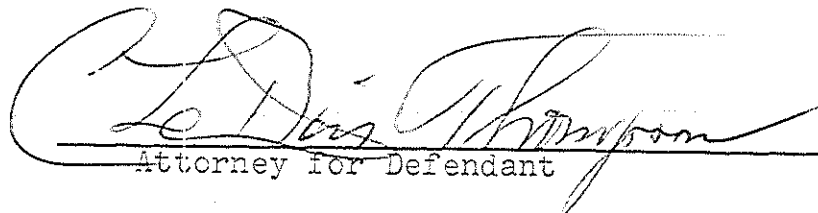
* AT LAW.

* CASE NO. 8840

*

Comes the defendant in the above styled cause and propounds the following interrogatories to the plaintiff, Interstate Securities Company of Alabama:

1. State your name.
2. Are you an officer or official of any kind in the Interstate Securities Company of Alabama?
3. State whether you advanced money by cash or check as a consideration for the note subject of the Civil Suit 8840.
4. State whether or not the note sued on is an original note or whether it is a renewal.
5. If it is a renewal attach copies of all renewal notes connected with this note.
6. State whether or not this obligation was entered into in Alabama and if so through what office.
7. State the original balance of the last loan made in money to the defendant.
8. Attach a sworn statement of account for all payments made by the defendant against the last loan at which money was advanced to the defendant.


Attorney for Defendant

STATE OF ALABAMA
BALDWIN COUNTY

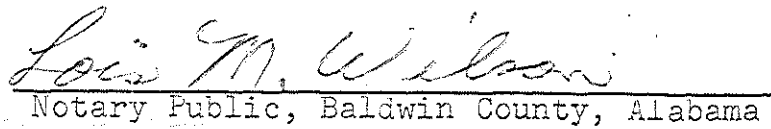
Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on

oath and says as follows:

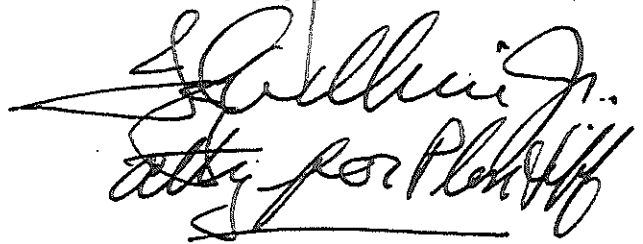
My name is C. LeNoir Thompson, I am the Attorney of Record for the defendant in the above entitled cause and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendant on the trial of said cause.


C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 24 day of May, 1971.


Notary Public, Baldwin County, Alabama

Service accepted - 6-2-71


Atty for Plaintiff

FILED

MAY 24 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

INTERSTATE SECURITIES COMPANY
OF ALABAMA

PLAINTIFF,

VS.

ALGIN B. SANKS

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

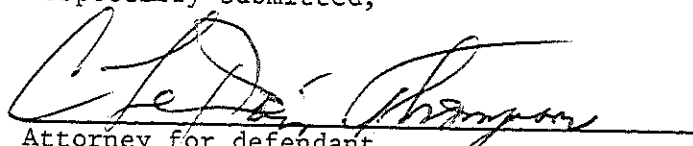
NO. 8840

DEMURRER

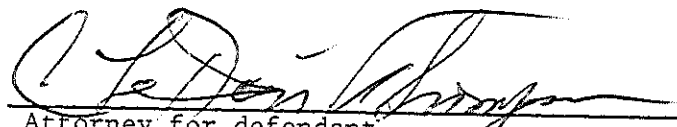
Comes the defendant in the above styled cause and demursto the
complaint filed in said cause and for demurrer shows unto this
Honorable Court as follows:

1. That for aught alleged in said cause there is usury included
in the monies set out and claimed to be due.
2. That for aught alleged there was no consideration for said note.

Respectfully submitted,


Attorney for defendant.

Defendant respectfully demands trial by jury.


Attorney for defendant.

FILED

SEP 15 1969

ALICE J. DUCK

CLERK
REGISTER

INTERSTATE SECURITIES COMPANY)
OF ALABAMA,

Plaintiff,

-vs-

ALGIN B. SANKS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 8840

A N S W E R :

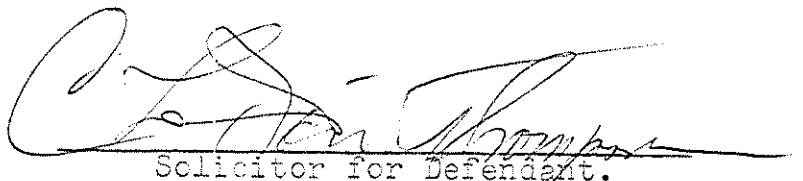
Comes the defendant in the above styled cause and for answer to the complaint filed in said cause shows as follows:

(1) He denies the allegations of said complaint, as untrue.

(2) Now comes the defendant, Algin B. Sanks, and for answer to said complaint says that he has paid the debt or demand for which suit was brought before this action was commenced.

(3) The defendant in answer to the complaint says that the said note upon which action is founded is usurious and void for the interest thereon.

(4) Defendant avers that there was no consideration for the note upon which complaint is filed in said suit.

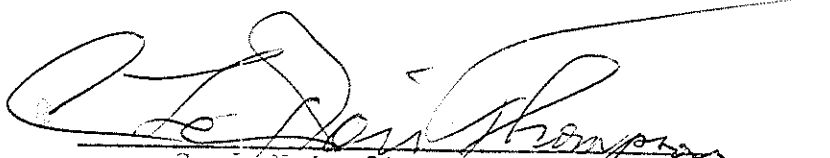

Solicitor for Defendant.

I, C. LeNoir Thompson, attorney for Algin B. Sanks, defendant in the above styled cause, hereby certify that I have this day mailed a copy of the above ANSWER to the Honorable Taylor Wilkins, Jr., attorney for the plaintiff in the above styled cause, by depositing a copy of the same in the United States Mail, properly addressed to him at his Bay Minette, Alabama, address, postage prepaid on this the 26 day of May, 1970.

FILED

MAY 27 1970

ALICE J. DUCK CLERK
REGISTER


C. LeNoir Thompson

INTERSTATE SECURITIES COMPANY X
OF ALABAMA,

Plaintiff,

-vs-

ALGIN B. SANKS,

Defendant.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW
X CASE NO. 8840
X

Comes Algin B. Sanks in answer to the Writ of Discovery
filed in the above styled cause to the Plaintiff.

(1) Your said Defendant has less than \$50.00 in money.

(2) Your said Defendant has no choses from which he can
benefit.

(3) Your said Defendant has no notes, bonds, or accounts
payable to him.

(4) Your said Defendant has no real property.

(5) Your said Defendant has no personal property other
than mechanics tools of the value of \$50.00.

(6) Your said Defendant has no property identified as
mixed or interest therein.

The said Defendant owes the following debts:

- (1) Baldwin County Bank-----\$800.00
- (2) First National Bank-----\$800.00
- (3) Dr. George Halliday-----\$220.00
- (4) Dr. bills through
Merchants Adjustment Service-----\$ 95.00
- (5) Dr, bills through
Mobile Adjustment Service-----\$257.00
- (6) Mutual Finance Corporation-----\$565.00
Mobile, Alabama
- (7) Interstate Securities Company
of Alabama-----\$1880.00

Respectfully submitted,

Algin B Sanks
Defendant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, C. LeNoir Thompson, a Notary Public, in and for said County, in said State, personally appeared ALGIN B. SANKS, who, being by me first duly sworn, says on oath that the facts set forth in the foregoing answer are true and correct.

Algin B. Sanks
ALGIN B. SANKS

Sworn to and subscribed before me, this 27th day of Oct,
1970.

C. LeNoir Thompson
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

FILED

OCT 27 1970

ALICE J. DUCK CLERK
REGISTER