

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6899

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Norman J. Currier

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.....

Norman J. Currier....., Defendant.....

by Alabama Baldwin Corporation, a Corporation,

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

Witness my hand this 17th day of March 1966

Price D. Duck Clerk

ALABAMA BALDWIN CORPORATION,  
a corporation,

Plaintiff,

vs.

NORMAN J. CURRIER,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

6899

The Plaintiff claims of the Defendant Two Thousand, Eight Hundred and Twenty-two Dollars and Forty-four Cents (\$2,822.44) due by Promissory Note made by him on the 12th day of February, 1965 and payable on the 30th day of November, 1965 with interest thereon at the rate of Seven (7%) percent from maturity.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure said note, including a reasonable attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Four Hundred and Twenty-five Dollars (\$425.00) as such reasonable attorneys' fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waives as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to personal property, and the Plaintiff claims the benefit of such waiver.

CHASON, STONE & CHASON

By

*John Earle Chason*  
Attorneys for Plaintiff

FILED

MAR 17 1966

CLERK  
REGISTER

Received 18 day of March 1966  
and on 26 day of March 1966  
I served a copy of the within &c  
on Norman J. Currier

By service on same

TAYLOR WILKINS Sheriff  
By Roy Randall D. S.  
G'lype

70 7<sup>00</sup>  
Ten Cents per line paid  
TAYLOR WILKINS, Sheriff  
By Roy Randall  
DEPUTY SHERIFF

ALABAMA BALDWIN CORPORATION,  
A corporation,

Plaintiff,

VS.

NORMAN J. CURRIER,  
Fairhope, Ala.  
Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

\* \* \* \* \*

COMPLAINT ON NOTE

\* \* \* \* \*

FILED

MAR 17 1966

ALABAMA

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

on Nov 30 1965 after date without grace 1 promise to pay to the order of  
Ala Baldwin Corp Two Thousand eight hundred  
+ twenty two dollars + forty four cents DOLLARS

for value received, in lawful money of the United States of America, with interest from Date of debit  
at the rate of 7 per cent per annum until paid.

Payable at End of Nov 1965

The parties to this instrument, whether maker, endorser, surety, or guarantor, each for himself, hereby severally waive as to this debt, or any renewal thereof, all rights of exemption under the Constitution and Laws of Alabama, as to personal property, and they each severally agree to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise. And the maker, endorser, surety or guarantor of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them and they agree that time of payment may be extended without notice to them of such extension. The bank at which this note is payable is hereby authorized to apply on or after maturity to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them. All suits for the collection of this note may be prosecuted in any county in this State that the payee or assignee elects.

Witness my hand and seal the 12th day of February, 1965

Witness George J. Cooper

Witness Johnny Sarmiento

No. \_\_\_\_\_ Due \_\_\_\_\_

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Norman J. Currier L. S.  
L. S.