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STATE OF ALABAMA }
BALDWIN COUNTY }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VICTOR F. GAAR to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of FARMERS & MERCHANTS BANK, Foley, Alabama.

WITNESS my hand this 20 day of July, 1935.

Robert L. Quirk
Clerk

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FARMERS & MERCHANTS BANK of }
Foley, a Corporation, }
Plaintiff, }

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

-vs-

COMPLAINT

VICTOR F. GAAR, }
Defendant. }

COUNT ONE

Plaintiff claims of the defendant THIRTY THREE HUNDRED & 00/100 (\$3300.00) DOLLARS due by promissory note made by him on the 6th day of June, 1931, and payable on the 6th day of December 1931, with interest thereon.

COUNT TWO


Plaintiff claims of the defendant THREE HUNDRED SIXTY THREE & 94/100 (\$363.94) DOLLARS the balance due by a promissory note made by him on the 6th day of June, 1931, and payable on the 6th day of December, 1931, with interest thereon.

COUNT THREE

Plaintiff avers that in, by and as a part of each of the notes sued on in counts one and two hereof, the defendant agreed to pay all costs of collecting, securing or attempting to collect or secure said notes, including a reasonable attorney's fee and the plaintiff avers that as to said notes the sum of FOUR HUNDRED FIFTY & 00/100 (\$450.00) DOLLARS is such reasonable attorney's fee and

the plaintiff claims of the defendant the further and additional sum of FOUR HUNDRED FIFTY & 00/100 (\$450.00) DOLLARS as such reasonable attorney's fee.

The plaintiff further avers that in, by and as a part of the notes sued on in Counts one and two hereof, the defendant waived as to said notes all right to exemption under the Constitution and Laws of Alabama or any other state as to personal property and of such waiver the plaintiff now claims the benefit.



Attorney for Plaintiff

Plaintiff demands a trial by jury.

RECORDED

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FAIRBANKS & MERCHANTS BANK OF
TOLSON, a corporation,

Plaintiff,

vs.

VICTOR E. GARR,

Defendant.

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

ANSWER

Filed August 19, 1935.
Robert A. Hall
Clerk.

BEEBE & HALL
LAWYERS
BAY MINETTE, ALABAMA

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