

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jean Cottongim a/k/a Mrs. Frank Cottongim a/k/a Jean C. Hall to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of the Baldwin County Bank, a Corporation.

Witness my hand, this the 22nd day of March, 1966.

Alice J. Duck
CLERK

BALDWIN COUNTY BANK,
A CORPORATION,

PLAINTIFF

VS

JEAN COTTONGIM a/k/a
MRS. FRANK COTTONGIM a/k/a
JEAN C. HALL

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 6908

---I---

The Plaintiff claims of the Defendant TWO-HUNDRED SEVENTY-TWO and NO/100 (\$272.00) DOLLARS, as balance due on a note for EIGHT-HUNDRED, SIXTEEN and NO/100 (\$816.00) DOLLARS made by her on the 3rd day of July, 1958 and payable on the 15th day of February, 1960 with interest thereon.

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

II

The Plaintiff claims of the Defendant EIGHTY-NINE and FORTY-SIX/100 (\$89.46) DOLLARS, as balance due on a note for TWO-HUNDRED THIRTY-EIGHT and FIFTY-SIX/100 (\$238.56) DOLLARS made by her on the 5th day of September, 1958 and payable on the 5th day of December, 1959 with interest thereon.

The note contains provision for a reasonable attorney's

fee and waiver of exemption whereof Plaintiff claims benefit.


Attorney for Plaintiff

Defendant may be found

FILED

MAR 22 1966

ALICE J. DUCK, CLERK
REGISTER

64-4-12-66

NUMBER: 6902

BALDWIN COUNTY BANK,
A CORPORATION,

PLAINTIFF

VS

JEAN COTTONGIM a/k/a
MRS. FRANK COTTONGIM a/k/a
JEAN C. HALL

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 22 1960

AUDRE L. DICK, CLERK
REGISTER

SUMMONS & COMPLAINT

Received 22 day of March 1960
and on 12 day of April 1960
I served a copy of the within on James C. Hall

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Delbert

7 miles north of Hays

14 miles
Ten Cents per mile Total \$1.40
TAYLOR WILKINS, Sheriff
By W. A. Delbert
DEPUTY SHERIFF

BALDWIN COUNTY BANK,
A Corporation,

Plaintiff,

vs.

JEAN COTTONGIM, also known
as Mrs. Frank Cottongim,
also known as Jean C. Hall,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 6908

DEMURRER

Comes now the Defendant in the above styled cause by her attorneys and demurs to the Complaint heretofore filed against her in the above styled cause and to each and every ground thereof, separately and severally, and assigns the following separate and several grounds in support thereof:

1. That said Complaint does not state a cause of action.
2. That said Complaint appears on its face to be barred by the statute of limitations of six years.

CHASON, STONE & CHASON

By John Earle Chason

CERTIFICATE OF SERVICE

We do hereby certify that we have this day mailed a copy of the above and foregoing Demurrer to Hon. Wilson Hayes, attorney for the Plaintiff, properly addressed to his office in Bay Minette, Alabama.

CHASON, STONE & CHASON

FILED

APR 21 1966

ALICE I. BARK, CLERK
& REGISTER

By John Earle Chason

6908

BALDWIN COUNTY BANK,
A Corporation,

Plaintiff,

vs.

JEAN COTTONGIM, also known as
Mrs. Frank Cottongim, also
known as Jean C. Hall,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 6908

DEMURRER

FILED

CLERK
ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jean Cottongim a/k/a Mrs. Frank Cottongim a/k/a Jean C. Hall to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of the Baldwin County Bank, a Corporation.

Witness my hand, this the _____ day of March, 1966.

CLERK

BALDWIN COUNTY BANK,
A CORPORATION,

PLAINTIFF

VS

JEAN COTTONGIM a/k/a
Mrs. FRANK COTTONGIM a/k/a
JEAN C. HALL

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: _____

Comes now the Plaintiff in the above styled cause and amends his Complaint to read as follows:

I

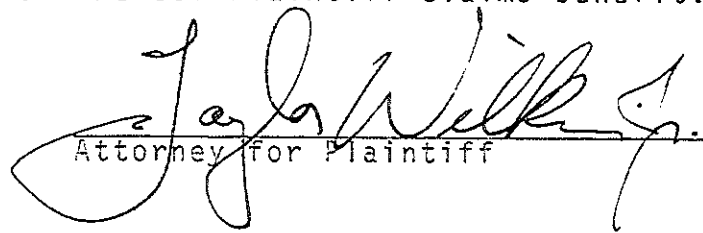
The Plaintiff claims of the Defendant TWO-HUNDRED SEVENTY-TWO and NO/100 (\$272.00) DOLLARS, as balance due on a note for EIGHT-HUNDRED, SIXTEEN and NO/100 (\$816.00) DOLLARS made by her on the 3rd day of July, 1958 and payable on the 15th day of October, 1960 with interest thereon.

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

II

The Plaintiff claims of the Defendant EIGHTY-NINE and FORTY-SIX/100 (\$89.46) DOLLARS, as balance due on a note for TWO-HUNDRED THIRTY-EIGHT and FIFTY-SIX/100 (\$238.56) DOLLARS made by her on the 5th day of September, 1958 and payable on the 5th day of October, 1960 with interest thereon.

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

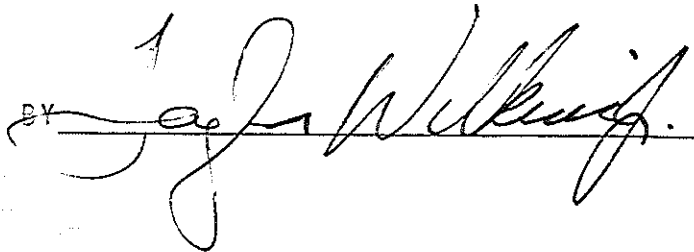

Attorney for Plaintiff

Defendant may be found

CERTIFICATE OF SERVICE

We do hereby certify that we have this day served a copy of the above and foregoing Amendment to Hon. John Earl Chason, attorney for the Defendant.

HAYES & WILKINS

BY 

FILED

APR 27 1966

ALICE L. DUCK, CLERK
REGISTERED

NUMBER:

6908

BALDWIN COUNTY BANK,
A CORPORATION

PLAINTIFF

VS

JEAN COTTONGIM a/k/a
MRS. FRANK COTTONGIM a/k/a
JEAN C. HALL

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

APR 27 1988

ALICE A. DICK
CLERK
REGISTER

Amended
SUMMONS AND COMPLAINT