

376

STATE OF ALABAMA, )  
BALDWIN COUNTY. ) IN THE CIRCUIT COURT--LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. O. Smith 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 Reconstruction Finance Corporation, a Corporation.

Witness my hand this 26 day of July, 1937.

Raduech  
Clerk.

COMPLAINT.

RECONSTRUCTION FINANCE CORPORATION, a Corporation,

Plaintiff,

-vs-

A. O. SMITH,

Defendant.

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

The Plaintiff claims of the Defendant Seventy-eight & 21/100 Dollars (\$78.21) due by Promissory Note made by him on, to-wit, August 28th, 1931, and payable on, to-wit, November 28th, 1931, to the order of the Robertsdale State Bank of Robertsdale, Alabama, with interest thereon, and the Plaintiff avers that it is the owner of the aforesaid Note by having acquired the same for value.

The Plaintiff further avers that in and by the terms of said Note the Defendant waived as to this debt or any renewal thereof all right of exemption under the Constitution and laws of Alabama or any other State as to personal property, and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further alleges and avers that in and by the terms 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 Attorney's fee, and the Plaintiff

(page two)

further claims of the Defendant the further and additional sum of  
Twenty-five Dollars (\$25.00) as such reasonable Attorney's fee.

John Pason  
Attorney for Plaintiff.

Presented 7-29-1937  
by serving copy of within Summons and  
Complaint on

A. O. Smith

M. H. Walden Sheriff  
B. C. N. Anderson Deputy Sheriff

*Quid*  
RECORDED 8-103

SUMMONS & COMPLAINT.

RECONSTRUCTION FINANCE COR-  
PORATION, a Corporation,

Plaintiff,

-vs-

A. O. SMITH,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.  
*No. 376*

Filed July 26, 1937  
B. C. N. Anderson  
Clerk.

LAW OFFICES  
HYBART & CHASON  
BAY MINETTE, ALABAMA

RECONSTRUCTION FINANCE COR-  
PORATION, a Corporation,

Plaintiff,

-vs-

A. O. SMITH,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

AMENDED COMPLAINT.

Comes the Plaintiff in the above styled cause and amends  
its Complaint heretofore filed in said cause so that the same shall  
read as follows:-

"RECONSTRUCTION FINANCE COR-  
PORATION, a Corporation,

Plaintiff,

-vs-

A. O. SMITH,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

COUNT 1: The Plaintiff claims of the Defendant Seventy-  
eight & 21/100 Dollars (\$78.21) due by Promissory Note made by him  
on, to-wit, August 28th, 1931, and payable on, to-wit, November  
28th, 1931, to the order of the Robertsdale State Bank of Robertsdal  
Alabama, with interest thereon, and the Plaintiff avers that it is  
the owner of the aforesaid Note by having acquired the same for  
value.

COUNT 2: The Plaintiff claims of the Defendant Sixty-  
five Dollars (\$65.00) due by Promissory Note made by him on, to-  
wit, August 17th, 1929, and payable on, to-wit, sixty days after  
date, to the order of Silverhill Creamery, Inc., with interest  
thereon, and the Plaintiff avers that it is the owner of the afore-  
said Note by having acquired the same for value.

The Plaintiff further avers that in and by the terms of  
said Notes the Defendant waived as to this debt or any renewal  
thereof all right of exemption under the Constitution and laws of  
Alabama or any other State as to personal property, and of this  
waived the Plaintiff now claims the benefit.

The Plaintiff further alleges and avers that in and by

(page two)

the terms of said Notes the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure, said Notes, including a reasonable Attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Forty Dollars (\$40.00), as such reasonable Attorney's fee.

Richard A. Charon  
Attorney for Plaintiff.

RECORDED, *Duch*  
*376* *8-111*

AMENDED COMPLAINT.

RECONSTRUCTION FINANCE COR-  
PORATION, a Corporation,

Plaintiff,

-vs-

A. O. SMITH,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed July *31*, 1937

*R. D. DeLoach*  
Clerk.

LAW OFFICES  
HYBART & CHASON  
BAY MINETTE, ALABAMA

*Aug 10<sup>th</sup>* 1937  
by serving copies within Summons and  
Complaint on

*A. O. Smith*

*M. H. Watkins* Sheriff

*John R. Davis* Deputy Sheriff



CERTIFICATE OF JUDGMENT

The State of Alabama, }  
Baldwin County

Circuit Court, Nov. Term, 19 37

RECONSTRUCTION FINANCE CORPORATION,

a Corporation,

PLAINTIFF.

Vs.

A. O. SMITH,

DEFENDANT.

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 26th day of November 19 37,

a Judgment was rendered by said Court in the above stated cause, wherein

RECONSTRUCTION FINANCE CORPORATION, a corporation,

was Plaintiff and

A. O. SMITH, was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

TWO HUNDRED FORTY-SIX & 57/100 (\$ 246.57) DOLLARS,

and for the sum of Twelve and no/100 (\$12.00) DOLLARS,

the costs in said suit and that HYBART & CHASON

are the Attorneys of record for the Plaintiff  
in said cause.

Witness my hand this 26th day of November 19 37

Clerk, Circuit Court, Baldwin County, Alabama.



CERTIFICATE OF JUDGMENT

The State of Alabama, }  
Baldwin County

Circuit Court, Nov. Term, 19 37

RECONSTRUCTION FINANCE CORPORATION,

a Corporation,

PLAINTIFF.

Vs.

A. O. SMITH,

DEFENDANT.

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 26th day of November 19 37,

a Judgment was rendered by said Court in the above stated cause, wherein

RECONSTRUCTION FINANCE CORPORATION, a corporation,

was Plaintiff and

A. O. SMITH,

was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

TWO HUNDRED FORTY-SIX & 57/100 (\$ 246.57) DOLLARS,

and for the sum of Twelve and no/100 (\$12.00) DOLLARS,

the costs in said suit and that HYBART & CHASON

are the Attorneys of record for the Plaintiff  
in said cause.

Witness my hand this 26th day of November 19 37

Clerk, Circuit Court, Baldwin County, Alabama.

CERTIFICATE OF JUDGMENT

RECONSTRUCTION FINANCE

CORPORATION, a Corp. Plaintiff

Vs.

A. O. SMITH,

Defendant

MOORE PRINTING CO., DAY MINNETT, ALA.