

BANK OF FAIRHOPE, a Banking
Corporation,

PLAINTIFF,

VS.

H. J. EDMOND and ELLEN R.
EDMOND,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW,

NO. 633

And now come the Defendants, separately and severally, and for answer
to the Plaintiff's complaint and to each count therein, says:

ONE:

That the facts therein alleged are untrue.

BEEBE & HALL,

By: *[Signature]*

Attorneys for Defendants.

The Defendants demand a trial by jury.

BEEBE & HALL,

By: *[Signature]*

Attorneys for Defendants

RECORDED

633

ANSWER:

BANK OF FAIRHOPE, a
Banking Corporation,

Plaintiff,

VS.

H. J. EDMOND and ELLEN R.
EDMOND,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW,

NO. 633.

*Filed January 21, 1941
R.S. Dyer, Register-Clark*

THE STATE OF ALABAMA,
Baldwin County.

No. 633

CIRCUIT COURT

DECEMBER, 1940

193

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon H. J. EDMONDS and ELLEN R. EDMONDS

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against H. J. EDMONDS
& ELLEN R. EDMONDS Defendant by BANK OF FAIRHOPE, A BANKING
CORPORATION,

Plaintiff

Witness my hand this 14th day of December 1940

H. S. Dush Clerk.

COMPLAINT

BANK OF FAIRHOPE, A BANKING
CORPORATION, Plaintiff

H. J. EDMONDS & ELLEN R.
EDMONDS, Defendants.

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

DEMERE & SMITH

Plaintiff's Attorney.

BANK OF FAIRHOPE, A BANK-
ING CORPORATION

vs.

H.J. EDMOND & ELLEN R.
EDMONDS

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA.

) NO. 633
) AT LAW.

FIRST COUNT: Plaintiff claims of the Defendant \$377.63, balance due by promissory note made by the Defendant on to-wit the 2nd day of December, 1938 and payable as follows: \$14.38 on January 10, 1939 and a like amount of the 10th day of every month thereafter for a total of 36 months until paid in full, with interest thereon at the rate of 6% from the due date. Plaintiff avers that the principal amount of the said note was \$517.40 and that amounts equal to the following were paid:

January 10, 1939	\$14.38
February 11, 1939	14.56
March 9, 1939	14.56
April 10, 1939	14.38
May 1, 1939	14.38
June 16, 1939	14.38
August 16, 1939	28.76
September 11, 1939	14.38
- - - - -	10.00

Said payments reducing the note to date to the amount of \$377.63 and since the time of the above has paid nothing and that Defendant is in default of said note and said note remains due and payable. Plaintiff avers that in and by said note Defendant agreed to pay a reasonable attorneys fee for the collection of the same by suit at law or otherwise, and Plaintiff therefore claims of the Defendant the sum of Fifty-six and 64/100 Dollars as attorneys fees and also claims interest on the principal at the rate of six per cent as prescribed in said note.

Demaree & Smith

By Richard J. Demaree
Attorneys for Plaintiff.

Defendant lives at Fairhope, Alabama.

Complaint on

H. J. Edmonds Dec 21, 1940
and *Ellen R. Edmonds*
Dec 23, 1940

W. R. Stuart Sheriff
By *H. G. Whitley* Deputy Sheriff

(EEG)

H. J. Edmonds served
12/27/40
Mrs. Ellen R. Edmonds served
12/23/40

Fairhope
RECORDED

STATE OF ALABAMA
COUNTY OF BALDWIN

BANK OF FAIRHOPE, A BANK-
ING CORPORATION, PLAINTIFF

VS.

H. J. EDMONDS & ELLEN R.
EDMONDS, DEFENDANT.

Filed December 14, 1940
R. S. Dorch, Clerk

DEMERE & SMITH
ATTORNEYS AT LAW
FIRST NATIONAL BANK BLDG.
MOBILE, ALA.

STATE OF ALABAMA)

BALDWIN COUNTY)

IN CIRCUIT COURT

NO. 633

BANK OF FAIRHOPE, a
Corporation

Plaintiff

Vs

H. J. EDMONDS,
ELLEN M. EDWARDS

Defendant

I, R. S. Duck, Clerk of Circuit Court of Baldwin County, Alabama,
certify that the above style case was on October 22nd, 1941,
dismissed by the Plaintiff, and the cost paid.

Signed

Clerk