

1162

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 O. B. SMITH 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 same, then and there to answer the Complaint of Farmers & Merchants Bank, a corporation.

WITNESS my hand this 19th day of March, 1948.

*Alice J. Wimber*  
Clerk

FARMERS & MERCHANTS BANK,  
A CORPORATION, } COMPLAINT  
Complainant } IN THE CIRCUIT COURT OF  
vs. } BALDWIN COUNTY, ALABAMA  
O. B. SMITH, } LAW SIDE.  
Defendant }

The Plaintiff claims of the Defendant Eighty Dollars (\$80.00) due by Promissory Note made by him on, to-wit: September 17, 1947, and payable in installments of Ten Dollars (\$10.00) a week, the last installment having been due and payable on, to-wit: January 4, 1947, with interest thereon at the rate of 8% per annum from January 4, 1947.

The Plaintiff avers that in and by the terms of the said note, the Defendant waived all right to 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 avers that in and by the terms of said note, the Defendant agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee and the Plaintiff further claims of the Defendant the further and additional sum of \$15.00 as such reasonable attorney's fee.

C. G. C.

Defendant's address is believed to be Thomasville, Alabama, and his place of employment, Scott Lumber Company.

*O. B. Smith*  
Attorney for Complainant

1162 93  
2054

RECORDED

COMPLAINT

Received in Sheriff's Office  
this 19 day of Mar. 1948  
TAYLOR WILKINS, Sheriff

FARMERS & MERCHANTS BANK, A  
CORPORATION,

Complainant

vs.

O. B. SMITH,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED

MAR 19 1948

ALICE J. DUCK, *Clerk*, Register

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

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 C. B. SMITH 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 same, then and there to answer the Complaint of Farmers & Merchants Bank, a corporation.

WITNESS my hand this \_\_\_\_ day of March, 1948.

Clerk

FARMERS & MERCHANTS BANK,  
A CORPORATION,

COMPLAINT

Complainant

vs.

C. B. SMITH,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE.

The Plaintiff claims of the Defendant Eighty Dollars (\$80.00) due by Promissory Note made by him on, to-wit: September 17, 1947, and payable in installments of Ten Dollars (\$10.00) a week, the last installment having been due and payable on, to-wit: January 4, 1947, with interest thereon at the rate of 8% per annum from January 4, 1947.

The Plaintiff avers that in and by the terms of the said note, the Defendant waived all right to 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 avers that in and by the terms of said note, the Defendant agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee and the Plaintiff further claims of the Defendant the further and additional sum of \$15.00 as such reasonable attorney's fee.

Defendant's address is believed to be Thomasville, Alabama, and his place of employment, Scott Lumber Company.

\_\_\_\_\_  
Attorney for Complainant



1163

## COMPLAINT

**FARMERS & MERCHANTS' BANK**  
**A CORPORATION,**

## Complaints

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE

FILED  
MAR 19 1948

**ALICE J. DUCK, Register**

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