

1163

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 and W. C. ROSS 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 State Bank of Elberta, a corporation.

WITNESS my hand this 19 day of March, 1948.

Alvin J. Welch
Clerk

STATE BANK OF ELBERTA, A
CORPORATION,

COMPLAINT

Complainant

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

vs.

O. B. SMITH and W. C. ROSS,

Defendants

The Plaintiff claims of the Defendants \$363.00 due by Promissory Note made by them on, to-wit: June 28, 1946, and payable on, to-wit: Thirty (30) days after date, but extended to October 12, 1947, with interest at the rate of 8% per annum from October 12, 1947.

The Plaintiff avers that in and by the terms of said note, the Defendants 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 Defendants 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 Defendants the further and additional sum of \$60.00 as such reasonable attorney's fee

Defendants addresses are believed to be as follows: O. B. Smith, Thomasville, Alabama, place of employment, Scott Lumber Co.
W. C. Ross, Foley, Alabama, place of employment, Corner Cafe.

[Signature]
Attorney for Complainant



COMPLAINT

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

Exacted By Sending a copy of
the Written With oil W. O. Ross
3-23-48
Taylor Wilkins Shuff.
Zellie B. Griffin D.S.

STATE BANK OF ALBERTA, A
CORPORATION,

Complainant

VS. c

O. B. SMITH and W. O. ROSS,

Defendants

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

FILED

MAR 19 1948

ALICE J. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA