

1225

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 Frank M. Wheatley, 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 Universal C. I. T Credit Corporation, a corporation.

Witness my hand this 24 day of August, 1948.

David J. Leuch  
Clerk.

COMPLAINT

UNIVERSAL C. I. T. CREDIT  
CORPORATION, a corporation,

Plaintiff,

vs.

FRANK M. WHEATLEY,

Defendant.

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

COUNT 1: The Plaintiff claims of the Defendant Three Hundred Sixty-two and 70/100 Dollars (\$362.70) due by Promissory Note made by him on, to-wit:- March 14, 1947, and payable in installments of Twelve and 09/100 Dollars (\$12.09), each, the first of said installments being due and payable April 30, 1947, which said note was payable to Delaney's Inc., and duly transferred by them to the Plaintiff; said note was executed in the sum of Four Hundred Twenty-five and 35/100 Dollars (\$425.35) and the Plaintiff admits the payments on said note of the installments due April, May, June, July, August and September, 1947; said note provided that upon the failure to pay any installment when due the entire balance became due and payable. That the sum of \$362.70, together with interest thereon is due and unpaid.

The Plaintiff avers that in, by and as a part of said note the Defendant waived all right to exemption as to personal property and of this waiver, the Plaintiff now claims the benefit.

The Plaintiff further avers that in, by and as a part of said note the Defendant agreed to pay all cost of collecting or securing or attempting to collect or secure said note whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of \$75.00 as such reasonable attorney's fee.

  
Attorneys for the Plaintiff.

Received in Sheriff's Office  
this 24 day of Aug., 1948  
TAYLOR WILKINS, Sheriff

Exempted by serving  
~~copy~~ copy on  
Frank M. Wheatley  
Sept. 11<sup>th</sup> 1948  
Taylor Wilkins Sheriff  
by A. R. Willis P.S.

RECORDED 1225

SUMMONS AND COMPLAINT

UNIVERSAL C. I. T. CREDIT  
CORPORATION, a corporation,

Plaintiff,

vs.

FRANK M. WHEATLEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

Filed this 24<sup>th</sup> day of August,  
1948.

Reice J. Leuck  
Clerk.

LAW OFFICES  
HYBART & CHASON  
BAY MINETTE, ALABAMA