

1309

THE UNION BANK,  
Repton, Alabama,  
A Corporation,

Plaintiff,

vs.

B. L. JONES,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff in the above styled cause by its attorneys and moves the Court to render a Judgment by Default in favor of the Plaintiff and against the Defendant for the amount claimed in Plaintiff's Complaint that has heretofore been filed in said cause.

A copy of said Summons and Complaint was served by the Sheriff of Baldwin County, Alabama, on the Defendant, B. L. Jones, on February 21, 1949, and he has to this date failed to plead, answer or demur to said Complaint.

WHEREFORE, the Plaintiff moves the Court to render a Judgment for the Plaintiff and against the Defendant on both Counts of said Complaint in the total sum of \$ 1035<sup>00</sup>.

Dated this 1st. day of April, 1949.

Hybart, Chason & Stone

BY:

John Chason  
As Attorney for Plaintiff.

MOTION FOR JUDGMENT BY  
DEFAULT

THE UNION BANK,  
Repton, Alabama,  
A Corporation,

Plaintiff,

vs.

B. L. JONES,

Defendant.

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

Filed April 1st., 1949.

Selfair J. Maslowski, Jr.  
Clerk. Judge.

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 B. L. Jones 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 the same, then and there to answer the complaint of The Union Bank, Repton, Alabama, a Corporation.

Witness my hand this 18 day of February, 1949.

Walter J. Smith  
Clerk.

THE UNION BANK,  
Repton, Alabama,  
A Corporation,

Plaintiff,

vs.

B. L. JONES,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant Four Hundred and Fifty-one Dollars (\$451.00) due by Promissory Note made by him on to-wit, August 8, 1947, and payable on to-wit, December 1, 1948, together with interest thereon.

The Plaintiff avers that in, by and as a part 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 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 One Hundred Dollars (\$100.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the constitution and laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

COUNT TWO

The Plaintiff claims of the Defendant Three Hundred and Seventy-Five Dollars (\$375.00) due by Promissory Note made by him on to-wit, August 28, 1947, and payable on to-wit, December 1, 1948, together with interest thereon.

The Plaintiff avers that in, by and as a part 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 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 Seventy-Five Dollars (\$75.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the constitution and laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

HYBART, CHASON & STONE

BY: 

Attorneys for Plaintiff.

Received in Sheriff's Office  
this 18 day of Feb, 1949  
TAYLOR WILKINS, Sheriff

Executed Feb. 21 19 49  
by serving copy of within Summons and  
Complaint on

B. L. Jones

Taylor Wilkins Sheriff  
by H. F. Hall Deputy Sheriff

7201309

SUMMONS & COMPLAINT

THE UNION BANK,  
Repton, Alabama,  
A Corporation,

Plaintiff,

vs.

B. L. JONES,

Defendant.

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

Filed February 18, 1949.

Alice J. Lucke  
Clerk.

LAW OFFICES  
HYBART, CHASON & STONE  
BAY MINETTE, ALABAMA