

1355

Complaint

James Calvin Carpenter

Ronald Deibro Sullivan

Plaintiff

vs

Defendant

The Plaintiff claims of the defendant the sum of One Hundred Fifty (150) Dollars due by virtue of the following allegations:

1. On March 27th 1945, Plaintiff loaned to Defendant the sum of One Hundred Twenty Five (125) Dollars.
2. On September 18th 1946, Defendant made his promissory waiver note in said sum payable to Plaintiff Sixty (60) Days after date.
3. Defendant has paid upon said note the sum of Twenty (20) Dollars.
4. Said promissory note provides that a reasonable attorney's fee be paid by defendant upon default necessitating the employment of an attorney to enforce payment thereof.
5. The balance of One Hundred Five (105) Dollars remains unpaid in satisfaction of said note.

E. A. Crane

Plaintiff's Attorney

Defendant resides at Foley, Alabama.

# THE BANK OF FAIRHOPE No.

ON MOBILE BAY  
61-461

FAIRHOPE, ALABAMA, March 27 1946

PAY TO THE  
ORDER OF

*Delbert S. Thomas*

\$ 125.00

*one hundred twenty five and 00/100*

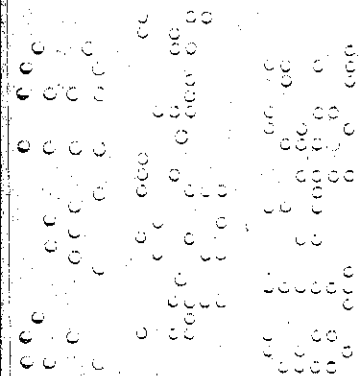
DOLLARS

COUNTER CHECK

*J. L. Carpenter*

Insured against fraudulent alteration

*Galbraith Sullivan*



# BANK OF FAIRHOPE

\$ 125.00

FAIRHOPE, ALA., September 18th 1946 19\_\_

Sixty (60) days

after date, without grace, I or We promise to pay to the

order of ~~BANK OF FAIRHOPE~~ J. C. Carpenter

One Hundred Twenty Five and 00/100

---DOLLARS

For value received. Payable at the BANK OF FAIRHOPE, Fairhope, Alabama.

The parties to this instrument, whether maker, endorser, surety or guarantor, each for himself hereby severally agrees to pay this note and waives as to this debt, or any renewal thereof, all right to exemption under the constitution and laws of Alabama, or any other state, as to personal property and they each severally agree to pay all costs of collecting, or securing, or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise. And the maker, endorser, surety or guarantor of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them, and they agree that time of payment may be extended without notice to them of such extension. The bank at which this note is payable is hereby authorized to apply on or after maturity, to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.

Witness my hand and seal this, the 18th day of September, 1946.

Robert Roland D Sullivan (Seal)

ATTEST

(Seal)

ADDRESS.

DUE

AMOUNT

PAID

INT.

PD. TILL

PRINCIPAL

BALANCE

Received in Sheriff's Office  
this 24 day of May, 1849  
JAMES WILKINS, Sheriff

20135'5'

Executed 6-4 19 49  
by serving copy of within Summons and  
Complaint on

Ronald Pelbre Sullivan

Taylor Melvin  
Glenford Stradman

James Calvin Carpenter

15.

Ronald Helbre Sullivan  
Jolley

Suit on account

**FILED**

MAY 23 1949

ALICE J. DUCK, Clerk

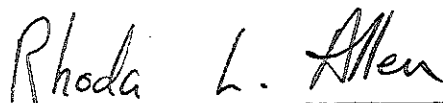
100

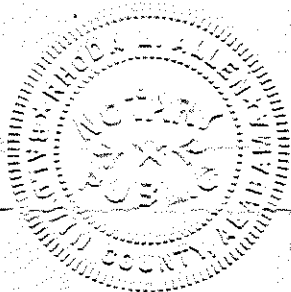
James Calvin Carpenter : Circuit Court  
Plaintiff :  
vs : Baldwin County  
Ronald Delbro Sullivan : Alabama  
Defendant : Civil: No. 1355

Personally appeared E. G. Rickarby, Jr., who, being duly sworn, deposes and says that he has practiced law in the State of Alabama for ~~twenty~~ years; That he is familiar with charges considered reasonable in favor of attorneys in matters of collection; That a reasonable charge for the collection of One Hundred Five Dollars (\$105.00) when suit is brought and carried to judgment is Twenty Five Dollars (\$25.00).



Subscribed and sworn to this 1st day of July, A. D. 1949, before me.

  
Notary Public, Baldwin County, Ala.



James Calvin Carpenter

Plaintiff

vs

Ronald Delbro Sullivan

Defendant

CIRCUIT COURT

BALDWIN COUNTY

ALABAMA

Civil: Number 1355

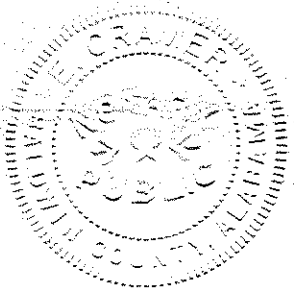
Personally appeared James Calvin Carpenter, who, being duly sworn, deposes and says that he is Plaintiff in the above titled cause; That he did make a loan to the defendant, Ronald Delbro Sullivan, on March 27th 1946, giving said defendant a check in the amount of One Hundred Twenty Five (125) Dollars; which said check was drawn upon and cashed by defendant at The Bank of Fairhope; That defendant, subsequent to said loan, gave Plaintiff a promissory note in said amount payable sixty (60) Days after date which said note was dated September 18th 1946; That defendant has paid on account of said note the sum of Twenty (20) Dollars and that the balance thereof remains unpaid to date hereof; That said note, by its terms, waives all exemptions allotted by law to the defendant maker thereof and provides for reasonable fees to the attorney handling the collection thereof in event of default; That Plaintiff submits herewith the check and note hereinabove mentioned as proof of said transaction; That there are no counter claims or set-offs against said debt.

James Calvin Carpenter

Subscribed and sworn to this 1st day of Sept A. D. 1949, before me.

E. Crum

Notary Public, Baldwin County, Alabama







James Calvin Carpenter

Plaintiff

vs

Ronald Delbro Sullivan

Defendant

Circuit Court

Baldwin County

Alabama

Civil: No. 1355.

(with waiver of all exemptions)

Plaintiff, by his Attorney, E. A. Cramer, hereby moves for judgment/  
by default since Defendant has failed to answer, plead or demur within  
the time prescribed by law since personal service was had, namely,  
June 4th 1949.

Plaintiff hereby submits his affidavit of indebtedness and other doc-  
umentary proof of same.

Plaintiff submits, also, affidavit of E. G. Rickarby, Jr., Attorney,  
showing the amount of reasonable fee believed to be allowable to  
Plaintiff's attorney.

A handwritten signature in dark ink, appearing to read "E. A. Cramer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Plaintiff's Attorney.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

No. \_\_\_\_\_

CIRCUIT COURT BALDWIN COUNTY

TERM, 1949

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ronald Delbro Sullivan

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

said Ronald Delbro Sullivan

, Defendant \_\_\_\_\_

by James Calvin Carpenter

Plaintiff \_\_\_\_\_

Witness my hand this

23<sup>rd</sup>

day of

May

1949

Alice J. Welch Clerk.

No.

Page

# THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

## Plaintiffs

vs.

## Defendants

# SUMMONS AND COMPLAINT

Filed \_\_\_\_\_ 194\_\_

Clerk

Plaintiff's Attorney

**Defendant's Attorney**

Moore Printing Co., Bay Minette, Ala.

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this \_\_\_\_\_ 194

by leaving a copy with

Sheriff

Deputy Sheriff