

1630

THE FIRST NATIONAL BANK OF  
OPELIKA,

Plaintiff,

vs.

GEO. T. INGRAM,

Defendant.

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

MOTION FOR JUDGMENT BY DEFAULT:

Comes the Plaintiff in the above styled cause, acting by and through its Attorneys of record, Chason & Stone, and files this its motion for a judgment by default in said cause and shows unto this court that personal service was had upon the Defendant in said cause on April 10, 1951, and more than thirty days having elapsed since service was had the defendant has failed to plead, answer or demur to the Complaint filed in said cause.

THE FIRST NATIONAL BANK OF OPELIKA

By: John A. Chason  
As its Attorneys of Record.

RECORDED  
INDEXED  
APR 11 1951  
BALDWIN COUNTY, ALABAMA  
COURT CLERK'S OFFICE

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

THE FIRST NATIONAL BANK OF  
OPELIKA,

Plaintiff,

vs.

GEO. T. INGRAM,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

Filed: May 28th, 1951.

Jeffrey A. Mashever, 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 Geo. T. Ingram 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 First National Bank of Opelika, Alabama.

Witness my hand this 24<sup>th</sup> day of March, 1951.

*David L. Smith*  
Clerk.

COMPLAINT:

THE FIRST NATIONAL BANK  
OF OPELIKA,  
Plaintiff,

vs.

GEO. T. INGRAM,  
Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant Seven Hundred Dollars (\$700.00) due by Promissory Note made by him on the 23rd day of June, 1950, and payable on the 23rd day of September, 1950, with interest thereon, which sum of money is still unpaid.

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 attorneys 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 Fifty Dollars (\$150.00) 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 there-

of, 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.

CHASON & STONE

By: John H. Chason  
Attorneys for Plaintiff.

Received in Sheriff's Office  
this 24 day of Mar 1951  
TAYLOR WILKINS, Sheriff

Executed 4-10 19 51  
by serving copy of within Summons and  
Complaint on

Geo. T. Ingram

Taylor Wilkins Sheriff  
By Edling Stead Deputy Sheriff

RECORDED  
RECORDED

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SUMMONS AND COMPLAINT

THE FIRST NATIONAL BANK OF  
OPELIKA,

Plaintiff,

vs.

GEO. T. INGRAM,

Defendant.

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

Filed: March 24, 1951.

Archie L. Remick  
Clerk.

LAW OFFICES  
HYBART, CHASON & STONE  
BAY MINETTE, ALABAMA

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