

1411

SUMMONS

THE STATE OF ALABAMA, )  
                                  )  
BALDWIN COUNTY.         )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon CLARENCE HEARD and E. E. HEARD to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin, State of Alabama, at Bay Minette, against CLARENCE HEARD and E. E. HEARD by HOME FINANCE, C. Cliff Beck, owner.

Witness my hand this the 28<sup>th</sup> day of Sept, 1949.

W. J. Duck  
Clerk

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COMPLAINT

HOME FINANCE,  
C. CLIFF BECK, OWNER,  
  
                                  Plaintiff  
  
                                  vs.  
  
CLARENCE HEARD and  
E. E. HEARD,  
  
                                  Defendants

IN THE CIRCUIT COURT OF  
  
BALDWIN COUNTY, ALABAMA  
  
AT LAW

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FORTY & 00/100 DOLLARS (\$440.00), due by promissory note made by said Clarence Heard and endorsed by said E. E. Heard on the 14th day of May, 1949, together with interest at the rate of 8 $\frac{1}{2}$  per annum, which balance is due and still unpaid.

As a part of said note the said Defendants agreed to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, which in this case the Plaintiff alleges to be \$66.00.

In, by and as a part of said note, the Defendants waive all right of exemption under the Constitution and laws of the State of Alabama, or any other State, as to personal property.

Amey S. Chavis  
Attorney for Plaintiff

The Defendants live West on the Dixie Road near the Sigafosse Place.

Received in Sheriff's Office  
this 28 day of Sept. 1949  
TAYLOR WILKINS, Sheriff

Executed Nov 14 1949  
by serving copy of within Summons and  
Complaint on

E E Heard

Taylor Wilkins Sheriff  
H F Hall Deputy Sheriff

720 14 11

SUMMONS AND COMPLAINT

HOME FINANCE, C. CLIFF BECK, OWNER,

Plaintiff

vs.

CLARENCE HEARD and E. E. HEARD,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

SEP 28 1949

ALICE J. BECK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
C. CLIFF BECK, OWNER,

Plaintiff

vs.

CLARENCE HEARD and  
E. E. HEARD,

Defendants

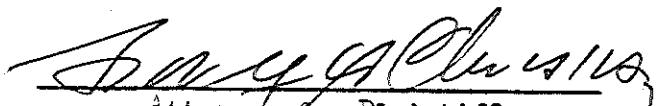
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Plaintiff by its attorney and moves the Court to render Judgment by Default against the Defendant in the principal amount of FOUR HUNDRED FORTY & 00/100 DOLLARS (\$440.00), together with interest thereon from the 14th day of May, 1949.

There is an affidavit by the Plaintiff to support this case attached hereto, which is sworn to before a notary public as to the amount of the indebtedness.

  
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE  
C. CLIFF BECK, OWNER

PLAINTIFF

VS.

CLARENCE HEARD AND E. E. HEARD

DEFENDANTS

FILED

JAN 19 1950

ALICE J. DUCK, Clerk