

1471

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:*

You are hereby commanded to summons L. E. Browder to appear within thirty (30) 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 Farmers & Merchants Bank, a corporation.

WITNESS my hand this 4th day of March, 1950.

W. A. Hinch
Clerk

* COMPLAINT *

FARMERS & MERCHANTS BANK,
a corporation,

Complainant,

-VS-

L. E. BROWDER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

The Plaintiff claims of the Defendant One Thousand Two Hundred Eighty & 40/100 Dollars (\$1,280.40) due by Promissory Note made by him on, to-wit, November 16, 1949, and due on, to-wit, December 15, 1949, with interest thereon at the rate of eight per cent (8%) per annum from December 25th, 1949.

The Plaintiff avers that in and by the terms of the said note, the Defendant waived all right to exemption under the Constitution and Laws of Alabama or any other state as to personal property and of this waiver the Plaintiff now claims the benefit.

The Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of \$150.00 as such reasonable attorney's fee.

Defendant's address is believed to be
Magnolia Springs, Alabama

W. A. Hinch
Attorney for Complainant.

3-15-50

no 1471

Received in Sheriff's Office
this 4 day of Mar 1950
TAYLOR WILKINS, Sheriff

Executed this day
march 15-1950
By Serving Copy on

L. E. Browder.

Sheriff
Taylor Wilkins
By
Edleigh Steadman

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK, a
corporation, Complainant,
-VS-
L. E. BROWDER,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

Filed
3-14-50
A. G. Chason
clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

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