

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

December 18, 1951

1733

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck:

You are hereby authorized and instructed to dismiss the case of
the Farmers & Merchants Bank of Foley, Alabama, vs: Oren O. Clemmons ---
Oren O. Clemmons and Hazel Petty Clemmons, case No. 1733.

Yours very truly,

Forest A. Christian
FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, - GREETING:

YOU ARE HEREBY COMMANDED to summon OREN O. CLEMMONS and HAZEL PETTY CLEMMONS 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 OREN O. CLEMMONS and HAZEL PETTY CLEMMONS, by the FARMERS & MERCHANTS BANK of Foley, Alabama.

Witness my hand this the 12th day of November, 1951.

W. J. Smith
CLERK

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COMPLAINT

FARMERS & MERCHANTS BANK,
FOLEY, ALABAMA,
PLAINTIFF

VS:

OREN O. CLEMMONS
- - -
OREN O. CLEMMONS AND HAZEL
PETTY CLEMMONS,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I: The Plaintiff claims of the Defendant the sum of THREE HUNDRED & 00/100 DOLLARS (\$300.00), due by promissory note made by OREN O. CLEMMONS on the 27th day of July, 1950, and payable on the 27th day of October, 1950, with interest thereon at the rate of 6% per annum, from date until paid.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be \$45.00, and said note also waives all right of exemption under the constitution and laws of the State of Alabama, or any other state in the United States.

COUNT II: The Plaintiff claims of the Defendants the sum of FOUR HUNDRED & 00/100 DOLLARS (\$400.00, due by promissory note made by OREN O. CLEMMONS and HAZEL PETTY CLEMMONS on the 19th day of August, 1950, and payable on the 19th day of November, 1950, with interest thereon at the rate of 6% per annum, from date until paid.

Said note also provides for a reasonable attorney's fee, which Plaintiff alleges to be \$60.00, and said note also waives all right of exemption under the constitution and laws of the State of Alabama, or any other state in the United States.

COUNT III: The Plaintiff claims of the Defendants the sum of THREE HUNDRED THIRTY THREE & 00/100 DOLLARS (\$333.00) due from them for money paid by the Plaintiff for the Defendants on, to wit: December, 1950, ONE HUNDRED SIXTY SIX & 50/100 DOLLARS (\$166.50) for insurance premium; and on, to wit: June, 1951, ONE HUNDRED SIXTY SIX & 50/100 DOLLARS (\$166.50) for insurance premium, together with interest thereon at the legal rate, to wit: 6% per annum, at their request, which sums of money, with interest thereon, are still unpaid.

The Defendants live Northeast
of Magnolia Springs, Alabama.

W. J. Smith
Attorney for Plaintiff

12-6-51

Received in Sheriff's Office
this 10 day of Dec, 1951
TAYLOR WILKINS, Sheriff

Served Dec 6 1951
to moving copy of within Summons and
Complaint on

Oren O. Clemmons
Hazel Petty Clemmons

Taylor Wilkins Sheriff
Steadman Hall Deputy Sheriff

1733

RECORDED

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK
FOLEY, ALABAMA,

PLAINTIFF

VS:

OREN O. CLEMMONS,

OREN O. CLEMMONS AND HAZEL
PETTY CLEMMONS,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

NOV 12 1951

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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