

STATE OF ALABAMA, ⁰
 ⁰
COUNTY OF BALDWIN. ⁰

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN M. PARKER and AMY T. PARKER to appear within thirty days from the service of this writ in the circuit court, to be held in and for said County, at the place of holding same, then and there to answer the complaint of F. C. Griffin.

Witness my hand this 10th day of March, 1953.

Richard K.
C L E R K.

C O M P L A I N T.

F. C. GRIFFIN,

Plaintiff,

VS.

JOHN M. PARKER and

AMY T. PARKER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

No.

1935

C O U N T O N E.

The Plaintiff claims of the Defendants FIVE HUNDRED SIXTY-
NINE AND 86/100ths (\$569.86) DOLLARS, ^{balance} /due by promissory note made
by them on March 11, 1946, and payable on the 11th day of March,
1948, with interest thereon from the 11th day of March, 1951.

C O U N T T W O.

The plaintiff claims of the Defendants SIX HUNDRED (\$600.00)
DOLLARS due by promissory note made by them on March 11, 1946, and
payable on the 11th day of March, 1949, with interest thereon from
the 11th day of March, 1951.

C O U N T T H R E E.

The Plaintiff claims of the Defendants SIX HUNDRED (\$600.00)
DOLLARS due by promissory note made by them on the 11th day of
March, 1946, and payable on the 11th day of March, 1950, with

interest thereon from the 11th day of March, 1951.

C O U N T F O U R .

The Plaintiff claims of the Defendants SIX HUNDRED (\$600.00) DOLLARS, due by promissory note made by them on the 11th day of March, 1946, and payable on the 11th day of March, 1951, with interest thereon from the 11th day of March, 1951.

Plaintiff avers that under and by the terms of the promissory notes sued on in Counts One, Two, Three and Four hereof, the defendants, severally, waived all right to exemption under the Constitution and laws of Alabama, as to personal property.

Plaintiff further avers that under and by the terms of the promissory notes sued on in Counts One, Two, Three and Four hereof, the Defendants, severally, agreed to pay all costs of collecting the same, including a reasonable attorney's fee, and Plaintiff avers that FIVE HUNDRED AND FIFTY (\$550.00) DOLLARS is a reasonable attorney's fee in the premises, and Plaintiff claims of the Defendants the sum of FIVE HUNDRED AND FIFTY (\$550.00) DOLLARS as a reasonable attorney's fee.

Jeffrey J. Moulton, Jr.
ATTORNEY FOR THE PLAINTIFF.

Defendants reside at Fairhope, Alabama.

701938 **RECORDED**

ORIGINAL

Received in Sheriff's Office
this 10 day of Mar 1953
TAYLOR WILKINS, Sheriff

F. C. GRIFFIN,
Plaintiff,
VS.
JOHN M. PARKER AND
AMY T. PARKER,
Defendants.

Served March 14 1953
by serving copy of within Summons and
Complaint on

John M. Parker
Amy T. Parker

Taylor Wilkins Sheriff
Edith Hedden Deputy Sheriff

SUMMONS AND COMPLAINT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.
NO. _____

FILED

3-10-53

ALICE A. DUCK, Clerk

TELFAIR J. MASHBURN, Jr.
LAWYER
Bay Minette, Alabama