

STATE OF ALABAMA     )  
                              \*  
BALDWIN COUNTY        )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. Lee Nowell, also known as Harold L. Nowell, doing business as Tiki Motel, 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 South Baldwin Bank.

Witness my hand this 19 day of September, 1969.

Alice J. Luck  
Clerk

The defendant resides at Gulf Shores, Alabama.

\* \* \* \* \*

SOUTH BALDWIN BANK,	)	
	)	
Plaintiff,	)	
	)	IN THE CIRCUIT COURT OF
VS.	)	
	)	BALDWIN COUNTY, ALABAMA
H. LEE NOWELL, also known as	)	
HAROLD L. NOWELL, d/b/a Tiki	)	AT LAW
Motel,	)	8889
	)	
Defendant.	)	


C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant One Thousand Three Hundred Seven and 75/100 Dollars (\$1,307.75), balance due by promissory note made by him August 9, 1968, and payable in 36 consecutive monthly installments of \$52.31 each, the first of which became due and payable on September 15, 1968, and the balance of said installments became due and payable on the same day of each month thereafter, with interest thereon at the rate of eight percent (8%) per annum. Plaintiff avers that in and by the terms of said promissory note the said defendant agreed to pay all costs of collecting or securing or attempting to collect or secure the said note, including a reasonable attorney's fee, which fee plaintiff avers to be \$175.00 and which it herewith claims.

COUNT TWO

The plaintiff claims of the defendant the following personal property, viz.: Custom Sign, 216 sq. ft. w/sequential flashed DAYGLO illumination and perimeter chaser lights at 6 in. intervals, with the value of the hire or use thereof during the detention, viz.: from the 9th day of August, 1968.

  
Attorney for Plaintiff

FILED

SEP 19 1969

ALICE J. DUCK

CLERK  
REGISTER

8889

South Baldwin Bank  
P.L.B.

vs.

H. Lee Nowell  
a/k/a - Harold L.  
Nowell, d/b/a  
Tike Motel  
left

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FILED

SEP 19 1969

ALICE J. DUCK CLERK  
REGISTER

J. R. Owen

Received 22 day of Sept 1969  
and on 9 day of Oct 1969  
I served a copy of the within A.C.  
on H. Lee Nowell  
BY SERVICE OF  
TAYLOR WILKINS, Sheriff  
J. R. Owen

Sheriff claims 100 miles at  
Ten Cents per mile Total \$10.00  
TAYLOR WILKINS, Sheriff  
J. R. Owen  
DEPUTY SHERIFF