

STATE OF ALABAMA )  
COUNTY OF BALDWIN )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON SAMUEL R. SHEPHERD TO APPEAR AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HEREOF OF THIS SERVICE, TO THE BILL OF COMPLAINT FILED AGAINST HIM IN THE CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY THE BALDWIN NATIONAL BANK, A CORPORATION.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS.

WITNESS MY HAND THIS 1<sup>ST</sup> DAY OF OCTOBER, 1969.

Alice J. Duck  
REGISTER

BALDWIN NATIONAL BANK, A  
CORPORATION,

PLAINTIFF )

IN THE CIRCUIT COURT OF

VS )

BALDWIN COUNTY, ALABAMA

SAMUEL R. SHEPHERD, )

AT LAW

DEFENDANT )

CASE NO: 8910

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF TWO HUNDRED TWENTY-ONE AND 04/100 (\$221.04) DOLLARS, DUE BY PROMISSORY NOTE MADE BY HIM ON, HERETOFORE, TO-WIT, NOVEMBER 18, 1968, WHICH SUM OF MONEY, WITH INTEREST THEREON FROM, TO-WIT, JULY 28, 1969 IS DUE AND UNPAID; AND PLAINTIFF AVERS THAT IN AND BY THE TERMS OF SAID NOTE, THE DEFENDANT WAIVED ALL RIGHTS OF EXEMPTION UNDER THE LAWS OF THE STATE OF ALABAMA, AND PLAINTIFF CLAIMS THE BENEFIT OF SAID WAIVER; PLAINTIFF CLAIMS THE ADDITIONAL SUM OF \$60.00 AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS SUIT FOR THAT THE DEFENDANT IN AND BY THE TERMS OF SAID NOTE AGREED TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFF AVERS THAT SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF THIS SUIT.

BAILEY & TAYLOR

By: Lloyd E. Taylor

ATTORNEY FOR THE PLAINTIFF

Received 1 day of Oct 1969  
and on 3 day of Oct 1969  
I served a copy of the within Att C  
on Samuel R. Shepherd

Sheriff claims 70 miles at  
Ten Cents per mile Total \$7.00  
TAYLOR WILKINS, Sheriff  
BY Randall  
DEPUTY SHERIFF

By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
BY Roy Randall D.S.  
Lybarger

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

CASE NO: 8910

BALDWIN NATIONAL BANK, A  
CORPORATION,

PLAINTIFF

VS

SAMUEL R. SHEPHERD,

DEFENDANT

FILED

OCT 1 1969

Alice J. Duck CLERK  
REGISTER

Bailey & Taylor

BAILEY & TAYLOR  
ATTORNEYS AT LAW  
61 NORTH SECTION STREET  
P. O. BOX 361  
FAIRHOPE, ALABAMA 36532

SEPTEMBER 30, 1969

MRS. ALICE J. DUCK:  
CLERK OF CIRCUIT COURT  
BAY MINETTE, ALABAMA

RE: BALDWIN NATIONAL BANK VS SAMUEL R.  
SHEPHERD

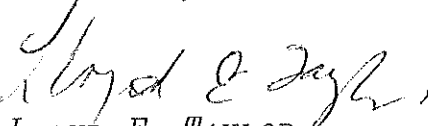
DEAR MRS. DUCK:

PLEASE FILE THE ENCLOSED AND HAVE A COPY  
SERVED ON THE DEFENDANT.

HE IS EMPLOYED AT GASTON MOTOR COMPANY IN  
FAIRHOPE, ALABAMA.

THANKING YOU FOR YOUR COOPERATION IN THIS  
MATTER, I AM

SINCERELY,



LLOYD E. TAYLOR

LET/W

INCL: AS NOTED

