

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 H. R. WILLIAMS AND ANN
E. WILLIAMS, TO APPEAR AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY
DAYS FROM THE DATE HEREOF OF THIS SERVICE, TO THE BILL OF COMPLAINT
FILED AGAINST THEM IN THE CIRCUIT COURT, AT LAW, FOR SAID COUNTY
AND SAID STATE BY DUNCAN M. TURNBULL AND ALICE W. TURNBULL.

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

WITNESS MY HAND THIS 17 DAY OF OCTOBER, 1969.

Alice W. Turnbull
REGISTER Circuit Clerk

DUNCAN M. TURNBULL AND
ALICE W. TURNBULL,

PLAINTIFFS

VS

H. R. WILLIAMS, AND ANN

E. WILLIAMS, JOINTLY AND INDIVIDUALLY,

DEFENDANTS

)
)
) IN THE CIRCUIT COURT OF

)
) BALDWIN COUNTY, ALABAMA

)
) AT LAW

)
) CASE NO: 8936

)

COUNT ONE:

PLAINTIFFS CLAIM OF DEFENDANTS THE SUM OF EIGHT HUNDRED
NINETY-SEVEN AND 75/100 (\$897.75) DOLLARS, DUE BY PROMISSORY NOTE
MADE BY THEM ON, HERETOFORE, TO-WIT, MARCH 15, 1967, WHICH SUM OF
MONEY, WITH INTEREST THEREON FROM, TO-WIT, FEBRUARY 23, 1967 IS
DUE AND UNPAID; AND PLAINTIFFS AVER THAT IN AND BY THE TERMS OF
SAID NOTE, THE DEFENDANTS WAIVED ALL RIGHTS OF EXEMPTION UNDER
THE LAWS OF THE STATE OF ALABAMA, AND PLAINTIFFS CLAIM THE BENEFIT
OF SAID WAIVER; PLAINTIFFS CLAIM THE ADDITIONAL SUM OF ONE HUNDRED
EIGHTY DOLLARS (\$180.00) AS A REASONABLE SUM AS ATTORNEY FEES FOR
BRINGING THIS SUIT FOR THAT THE DEFENDANTS IN AND BY THE TERMS OF

SAID NOTE AGREED TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFFS
AVER THAT SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING
AND PROSECUTING OF THIS SUIT.

COUNT TWO:

PLAINTIFFS FURTHER CLAIM OF DEFENDANTS THE SUM OF FOUR
HUNDRED FIFTY-FIVE AND 96/100 DOLLARS (\$455.96), DUE BY PROMISSORY
NOTE MADE BY THEM ON, HERETOFORE, TO-WIT, JUNE 15, 1967, WHICH
SUM OF MONEY, WITH INTEREST THEREON FROM, TO-WIT, FEBRUARY 23, 1969
IS DUE AND UNPAID; AND PLAINTIFFS AVER THAT IN AND BY THE TERMS OF
SAID NOTE, THE DEFENDANTS WAIVED ALL RIGHTS OF EXEMPTION UNDER THE
LAWS OF THE STATE OF ALABAMA, AND PLAINTIFFS CLAIM THE BENEFIT OF
SAID WAIVER; PLAINTIFFS CLAIM THE ADDITIONAL SUM OF NINETY DOLLARS
(\$90.00) AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS
SUIT FOR THAT THE DEFENDANTS IN AND BY THE TERMS OF SAID NOTE
AGREED TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFFS AVER THAT
SAID AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND
PROSECUTING OF THIS SUIT.

BAILEY & TAYLOR

By *Blond E. Taylor*
ATTORNEYS FOR THE PLAINTIFF

FILED

OCT 17 1969

ALICE J. DUCK CLERK
REGISTER

24
10-20-69

BILL OF COMPLAINT

DUNCAN TURNBULL AND
ALICE W. TURNBULL,

PLAINTIFFS

VS

H. R. WILLIAMS, AND ANN E.
WILLIAMS, JOINTLY AND INDI-
VIDUALLY,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 8936

DEFENDANTS ADDRESS:
P.O. DRAWER 940
BAY MINETTE, ALA.

Received 17 day of Oct 1969
and on 28 day of Oct 1969

I served a copy of the within Sec

on H. R. Williams

and Ann E. Williams

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Williams