

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA  
August 26, 1953

2052

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

Dear Mrs. Duck:

You are hereby authorized to release and discharge the case  
of Farmers & Merchants Bank of Foley, Alabama, vs. Hugh Don Linton,  
which was filed about a month ago.

You will find my check enclosed for the Court costs.

Yours very truly,



FOREST A. CHRISTIAN

FAC/jew  
enc.;

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

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

You are hereby commanded to summon HUGH DON LINTON 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 HUGH DON LINTON, by the FARMERS & MERCHANTS BANK of Foley, Alabama, a corporation.

WITNESS my hand, this the 7<sup>th</sup> day of August, 1953.

James L. Henck  
Clerk of Court

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COMPLAINT

FARMERS & MERCHANTS BANK,  
Plaintiff

VS.

HUGH DON LINTON,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

The Plaintiff claims of the Defendant the sum of TWO HUNDRED & 00/100 DOLLARS (\$200), due by promissary note made by him on the 23rd day of October, 1952, and payable on the 23rd day of November, 1952, with interest thereon, at the rate of eight per cent (8%).

Said note also provides for a reasonable attorney's fee and waives all exemption under the laws and Constitution of Alabama or any other State as to personal property. Plaintiff alleges reasonable attorney's fee to be \$40.00.

Said note is secured by the conveyance to said Plaintiff of one 1951 Model Chevrolet Convertible Coupe Motor No. JAM-524569, Serial No. 8JKL-65144.

Forest A. Christian  
Forest A. Christian, Atty. for Plaintiff

There is attached hereto and made a part hereof an affidavit by an official of the Plaintiff before a Notary Public setting out status of this account as of August 6, 1953.

Forest A. Christian

AFFIDAVIT OF ANTHONY SMITH

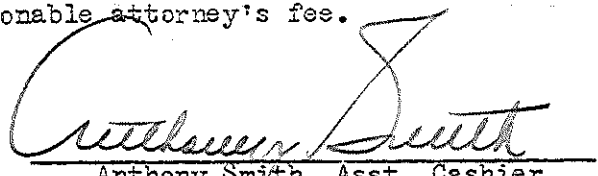
THE STATE OF ALABAMA, }  
BALDWIN COUNTY. }

ANTHONY SMITH, first being sworn, deposes and says as follows:

My name is Anthony Smith, and I am Assistant Cashier of the Farmers & Merchants Bank of Foley, Alabama. I know that on October 23, 1952, Hugh Don Linton of Foley, Alabama, came to the Bank and borrowed TWO HUNDRED & 00/100 DOLLARS (\$200) on a chattel mortgage note which mortgaged One 1951 Model Chevrolet Convertible Coupe Motor No. JAM-524569, Serial No. 8JKL-65144. This note was due and payable November 23, 1952. Said note provides for interest at the rate of eight per cent (8%) and is a waive note and it also provides for a reasonable attorney's fee.

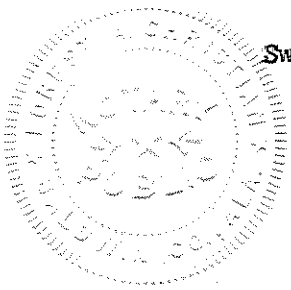
Although demand has been made on Hugh Don Linton, he has failed to pay any principal and interest on the note and it is long past due.

The said Hugh Don Linton owes the Farmers & Merchants Bank of Foley, Alabama, TWO HUNDRED & 00/100 DOLLARS principal plus interest from May 23, 1953, at eight per cent (8%) plus reasonable attorney's fee.

  
Anthony Smith, Asst. Cashier

Sworn to and subscribed before me on this the 6th day of August, 1953.

  
Notary Public



8-22-53

Received in Sheriff's Office  
This 7 day of Aug 53  
1953

Executed Aug, 20. 1953  
By Serving copy on  
Hugh Don Linton

702058

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

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SUMMONS & COMPLAINT

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FARMERS & MERCHANTS BANK,

PLAINTIFF

VS.

HUGH DON LINTON,

DEFENDANT

FILED

AUG 7 1953

ALICE L. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

Sheriff  
Taylor Wilkins  
By  
Edleigh Steadham

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA