

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

9 September 1970

Hon. Telfair Mashburn
Bay Minette, Alabama

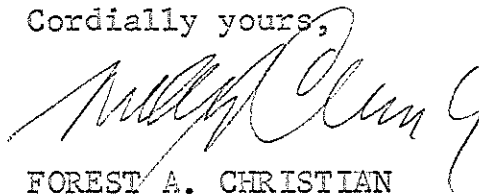
Re: Farmers & Merchants Bank
Foley, Alabama

Vs: Heather Newell

Dear Judge Mashburn:

Kindly issue a default judgment on a Promissory ^{note} note on
which there is principal balance of \$101.50, plus Interest
of \$23.21, plus \$25.00 Attorney's fee, for a total of
\$149.71.

Cordially yours,



FOREST A. CHRISTIAN

Enclosure

\$ 200.00

NOV 13 1967
FOLEY, ALABAMA

19

For value received, I or we, jointly and severally, promise to pay to the order of

FARMERS AND MERCHANTS BANK

FOLEY, ALABAMA

Two Hundred ----- DOLLARS

payable at FARMERS AND MERCHANTS BANK, Foley, Alabama, in 4 monthly installments of

\$50.00 each, and one installment of \$ none, the first installment to become due and payable on

or before the 10th day of December 1967, and one installment to become due and payable on or

before the 10th day of each succeeding month until the whole of said indebtedness is paid, with interest from

Maturity at the rate of 8 per annum.

If any installment of this note is not paid at the time and place specified, the entire amount unpaid shall be due and payable at the election of the holder hereof.

The parties to this instrument, whether maker, endorser, surety or guarantor, each for himself, hereby severally agrees to pay this note and waives as to this debt, or any renewal thereof, all right to exemption under the constitution and laws of Alabama, or any other State, as to personal property and they each severally agree to pay all costs of collecting or securing, or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise, and maker, endorser, surety or guarantor, of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them, and they agree that time of payment may be extended without notice to them of such extension. The Bank at which this note is payable is hereby authorized to apply on or after maturity to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.

No. 76806 R

Heather Newell (Seal)
Heather Newell

Address Rt 1 Box 19-A C Foley, Ala.

P.O. Box 1085 Foley, Ala. (Seal)

~~CONFIDENTIAL - PAYROLL~~

APR 19 1968 1.50 5/10/68

JUN 22 1968 2.00 7/1/68

19 9.00 10/14/31

19 8814 10/2-31 1981

19 629 10 92-12-19

18 9 10

1919 \$ 1919

vol: 65 page: 593

Interest assigned
by bank 9/9/70.

12 6.0 2 *T

900

8.1 2

6.0 9

23.21 *T

SUMMONS

STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons HEATHER NEWELL, 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, Alabama, at the place of holding same by FARMERS & MERCHANTS BANK of Foley, Alabama, a corporation.

Witness my hand this the 9th day of June, 1970.


Clerk

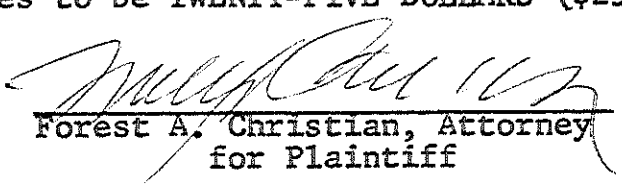
** ** *** ** **

COMPLAINT

FARMERS & MERCHANTS BANK	X	
of Foley, Alabama, a	X	IN THE CIRCUIT COURT OF
corporation,	X	
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
HEATHER NEWELL,	X	9319
DEFENDANT.	X	

The Plaintiff claims of the Defendant ONE HUNDRED ONE & 50/100 DOLLARS (\$101.50), due by promissory waive note made by her on the 13th day of November, 1967, and payable on the 1st day of July, 1968, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be TWENTY-FIVE DOLLARS (\$25.00).


Forest A. Christian, Attorney
for Plaintiff

Defendant's address:

P. O Box 1085
Foley, Alabama 36535

FILED

JUN 9 1970

ALICE J. DUCK CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA 36535

72
Sheriff claims
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
miles at

Received 9 day of June 19 20
and on 15 day of July 19 70
I served a copy of the within on Heather Newell

By service on

TAYLOR WILKINS, Sheriff
72

9319

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK of Foley,
Alabama, a corporation,

PLAINTIFF,

VS:

HEATHER NEWELL,

DEFENDANT.

FILED
JUN 9 1970
ALICE J. DECK CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535