

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALBERT J. KNIGHT,  
P.O. Box 705, residing in Mills Quarters, Foley, Alabama, employed  
by Hale Mfg. Co, Foley, Alabama, to appear within thirty days after  
the service of this summons in the Circuit Court to be held for  
said county, then and there to demur or plead to the complaint of  
The Merchants National Bank of Mobile, Inc., a corporation.

Witness my hand this 12 day of January, 1971.

*Alice J. Duck*  
Clerk

\* \* \* \* \*

THE MERCHANTS NATIONAL BANK	)	
OF MOBILE, Inc.,	)	IN THE CIRCUIT COURT OF
a corporation,	)	BALDWIN COUNTY, ALABAMA
Plaintiff	)	AT LAW
v.	)	NO. <u>9638</u>
ALBERT J. KNIGHT,	)	
Defendant	)	

COMPLAINT

The Plaintiff, The Merchants National Bank of Mobile, Inc., a corporation, claims of the Defendant, Albert J. Knight, Four hundred and thirty-four and 64/100ths Dollars(\$434.64) due by note executed by the Defendant on August 12, 1969, and payable in thirty-six(36) consecutive monthly installments of \$14.56 beginning on September 25, 1969, payable to the ABC Fence Industries, Inc., who then duly endorsed said note to the Plaintiff in this cause, this note being due and payable, with interest thereon.

And the Plaintiff avers that so far as the collection of this debt is concerned, Defendant has agreed to pay a reasonable attorney's fee for collection and Plaintiff claims \$50.00 as a reasonable attorney's fee. The note is attached to this complaint and made a part thereof.

**FILED**

JAN 12 1971

*Daniel E. Robison*  
Daniel E. Robison  
Plaintiff's Attorney

26  
1-18-71  
**ALICE J. DUCK**

CLERK  
REGISTER

VOL 65 PAGE 840

SPC  
(100)

59.16  
N/4.25-1

JMS.

# PROPERTY IMPROVEMENT LOAN

Mobile, Ala., August 12, 1969

I/We promise to pay to the order of ABC Fence Industries, Inc.

Five hundred twenty four dollars and 16/100 Dollars \$ 524.16  
for value received. Payable at THE MERCHANTS NATIONAL BANK OF MOBILE, MOBILE, ALA.

In 36 consecutive monthly installments of \$ 14.56, beginning September 25, 1969

after date without grace and balance of \$ \_\_\_\_\_ payable \_\_\_\_\_

Upon failure of maker(s) to pay any installment as herein agreed and a continuation of such default for a period of fifteen days, then, at the option of the holder of this note, the whole of said principal sum shall immediately become due and payable.

The maker(s) of this note warrant(s) and agree(s) that its proceeds will be used to cover payments for alteration, repairs or improvements upon real property belonging to the maker(s).

It is understood and agreed that a late charge of five cents per dollar will be paid by the maker(s) on each installment more than fifteen days in arrears.

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 all right of exemption under the Constitution and Laws of Alabama, or any other State, 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 the maker, endorser, surety or guarantor of this note severally waives presentment, protest, notice of protest, suit and all other requirements necessary to hold them. It is understood and agreed that a late charge of five cents per dollar will be paid by the maker(s) on each installment more than fifteen days in arrears.

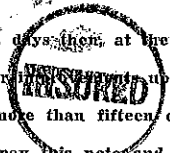
P. O. Box 705, Foley, Ala.

Address

36535  
Address 01-0102736-01

Albert J. Knight (SEAL)

Annie Knight (SEAL)  
ALBERT J. KNIGHT & MRS. ANNIE KNIGHT



PAY TO THE ORDER OF  
THE MERCHANTS NATIONAL BANK  
OF MOBILE  
MOBILE, ALABAMA

WITHOUT RECOURSE

EXCEPT THAT THE UNDERSIGNED ENDORSER WARRANTS THAT ALL ARTICLES AND MATERIALS CONTRACTED FOR HAVE BEEN FURNISHED AND INSTALLED AND ALL WORK FULLY COMPLETED WHICH CONSTITUTES THE ENTIRE CONSIDERATION FOR WHICH THIS NOTE WAS EXECUTED AND DELIVERED BY THE MAKER.

ABC Fence Industries, Inc.

BY

W. M. G. H. E. E. L. L.

TITLE Secty. - Treas.

524.16  
- 59.16  
465.00  
524.16  
524.16  
- 465.00  
59.16

9438

The Merchants Nat Bank

VS

Albert J. Knight

FILED

JAN 12 1971

ALICE J. DUCK CLERK REGISTER

W. Robinson

Received 12 day of Jan. 19 71  
and on 14 day of Jan 19 71  
I served a copy of the within 840  
on Albert J. Knight  
By service on \_\_\_\_\_  
\_\_\_\_\_

TAYLOR WILKINS, Sheriff  
Robert J. Wilkins D.S.

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY Robert J. Wilkins  
DEPUTY SHERIFF

\* \* \* \* \*

*Daniel E. Robison*

P. O. Box 794  
PHONE 943-4955

ATTORNEY AT LAW

117 So. Alston Street  
FOLEY, ALABAMA 36535

February 23, 1971

Clerk of the Court, at Law  
Bay Minette, Alabama

RE: Merchants National Bank  
v.  
Albert J. Knight  
Civil, Non-Jury # 9638

At the time of filing, this complaint had the promissory note attached. More than 30 days have passed since the Defendant has been served, so we move for a default judgment and ask that you place this file on the Judge's desk.

The note provides that in case of default, all payments are due and payable, and that there is also a "late charge" of 5¢ on the dollar of the due amount.

\$434.64	+	\$21.73(late charge)	=	\$456.37
		Attorney Fee		<u>75.00</u>
		TOTAL		\$531.37

Thank you.

*Daniel E. Robison*  
Daniel E. Robison

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA  
36535

June 11, 1971

AREA CODE 810  
TELETYPE 743-2851

AREA CODE 205  
TELEPHONE 943-8611

Mrs. Eunice B. Blackmon, Clerk  
CIRCUIT COURT OF BALDWIN COUNTY  
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

Re: Merchants National Bank  
vs.  
Albert J. Knight

We as Garnishee in the above case wish to inform you that Albert J. Knight is employed by us and that we are indebted to him. As of week ending June 13, 1971, we will begin deducting 25% out of his wages after taxes, sui and social security have been deducted.'

We will withhold the total amount of \$531.37. If this amount does not agree with your figures, please advise.

If we can be of further help in the above matter, please let us know.

Very truly yours,

THE HALE MANUFACTURING COMPANY

*June Taylor*  
(Mrs.) June Taylor  
Office Manager

jt

FILED

JUN 14 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

9638 1/2

Daniel E. Robison

ATTORNEY AT LAW

P. O. Box 794  
PHONE 943-4955

117 So. Alston Street  
FOLEY, ALABAMA 36535

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Civil Non-Jury

MERCHANTS NATIONAL V. KNIGHT

#9638 $\frac{1}{2}$

This case is in the midst of garnishment. Please keep it open.

*Dan Robison*