

STATE OF ALABAMA
COUNTY OF BALDWIN

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON ROBERT WATKINS, 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
THOMAS-CORTE PONTIAC, INC.

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

WITNESS MY HAND THIS 19 DAY OF Jan., 1971.

Ernie B. Blackman
CLERK

THOMAS-CORTE PONTIAC, INC.

PLAINTIFF

VS.

ROBERT WATKINS

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO: 9644

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF THREE HUNDRED
TEN AND 84/100 (\$310.84) DOLLARS, DUE BY PROMISSORY NOTE MADE BY
HIM ON, HERETOFORE, TO-WIT, FEBRUARY 16, 1970, WHICH SUM OF MONEY,
WITH INTEREST THEREON FROM TO-WIT, NOVEMBER 26, 1970, 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 SIXTY (\$60.00) AND NO/100
DOLLARS, AS A REASONABLE SUM AS ATTORNEY FEES FOR BRINGING THIS
SUIT FOR THAT THE DEFENDANT IN AND BY THE TERMS OF SAID NOTE AGREED

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TO PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFF AVERS THAT SAID
AMOUNT IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECU-
TING OF THIS SUIT.

BAILEY & TAYLOR

By: Sherry E. Taylor
ATTORNEY FOR THE PLAINTIFF

FILED

MAR 19 1971

Erinice B. Blackburn
Clerk

CASE NO: 9644

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

THOMAS-CORTE PONTIAC, INC.

PLAINTIFF

VS.

ROBERT WATKINS

DEFENDANT

DEFENDANT MAY BE SERVED AT:

ELM STREET
FAIRHOPE, ALABAMA

Filed
1-19-71
Ernie B. Blackburn
Clerk

BAILEY & TAYLOR
ATTORNEY FOR PLAINTIFF

Received 19 day of Jan 1971
and on 23 day of " 1971
I served a copy of the within St C
on Robert Watkins
By service on - Above -
TAYLOR WILKINS, Sheriff
By W. Cook D. S.

Sherriff's clerk's 70 miles
Total \$ 7.00
TAYLOR WILKINS, Sheriff
W. Cook