

BALDWIN NATIONAL BANK OF  
ROBERTSDALE, A CORPORATION

Plaintiff

VS.

JOHN R. DUNCAN

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9696

1.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FORTY and 80/100 DOLLARS (\$540.80) balance due after all proper credits given on a promissory note made by the Defendant on the 28th day of April, 1970, and payable as follows: 18 monthly installments of \$41.60 each, the first installment due and payable on June 15, 1970. The Plaintiff avers that the Defendant defaulted in the payment of the installments and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff claims interest at the rate of 8% per annum from April 28, 1970. The Plaintiff further avers that the Defendant agreed in the promissory note to pay all expenses including a reasonable attorney's fee incurred in collecting the same and the Plaintiff claims a reasonable attorney's fee in the amount of \$85.00.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY SIX and 35/100 DOLLARS (\$196.35) balance due after all proper credits given on a promissory note made by the Defendant on the 11th day of September, 1970 and payable as follows: 12 monthly installments of \$17.85 each, the first payment due and payable on October 20, 1970. The Plaintiff avers that the Defendant defaulted in the payment of the installments and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff claims interest at the rate of 8% per annum from September 11, 1970. The Plaintiff further avers that the Defendant agreed in the promissory note to pay all expenses including reasonable attorney's fees incurred in collecting the same and the Plaintiff claims a reasonable attorney's fee in the amount of \$30.00. The Defendant waives all rights of exemption as to personal property.

FILED  
B 17 1971

WILTERS, BRANTLEY & NESBIT

BLACKMON CIRCUIT  
CLERK

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SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. ....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon .....JOHN R. DUNCAN.....

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.....

JOHN R. DUNCAN  
....., Defendant.....

by BALDWIN NATIONAL BANK OF ROBERTSDALE, A CORPORATION  
.....

....., Plaintiff.....

Witness my hand this.....17.....day of.....Sep.....19<sup>71</sup>.....

*Eunice B. Blackmon*, Clerk

24/  
12-18-71

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

Baldwin National Bank of

Robertsdale, a Corp.

Plaintiffs

vs.

John R. Duncan

Defendants

**SUMMONS AND COMPLAINT**

Filed **FILED** 19.....

**FEB 17 1971** Clerk

EUNICE B. BLACKMON CIRCUIT  
CLERK

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Robertsdale, Alabama and  
works at Baldwin Supply in  
Robertsdale

Received In Office

Feb 17 1971

Taylor Wilkins Sheriff

I have executed this summons

this 2/18 1971

by leaving a copy with

BR

John R. Duncan

Sheriff claims 50 miles at

For Costs per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Brown  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. H. Brown Deputy Sheriff