

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Wayne Broadhead to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of First National Bank of Mobile.

WITNESS my hand this 4th day of March, 1971.

Eunice B. Blackburn
Clerk

Defendant resides at Robertsdale.
Employed at South Baldwin Mills.

* * * * *

FIRST NATIONAL BANK OF MOBILE,)
)
 Plaintiff,)
VS.)
)
WAYNE BROADHEAD,)
)
 Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
9728

C O M P L A I N T

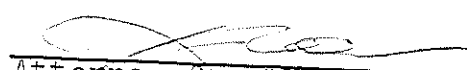
COUNT ONE

The plaintiff claims of the defendant Six Hundred Fifty-five and 16/100 Dollars (\$655.16) due from him by account on the 1st day of December, 1970, which sum of money, with the interest thereon, is still unpaid. Plaintiff avers that in and by the terms of a customer agreement executed by the defendant, the said defendant agreed to pay all credit extended to him by the use of a BankAmericard and finance charges where applicable, in accordance with billings including a reasonable attorney's fee in the event of suit or action. Plaintiff avers that a reasonable attorney's fee in connection with this suit or action is the sum of \$100.00 and which it herewith claims.

COUNT TWO

The plaintiff claims of the defendant Six Hundred Fifty-five and 16/100 Dollars (\$655.16) for money paid by the plaintiff

for the defendant on the 1st day of December, 1970, at his request, which sum of money, with the interest thereon, is still unpaid. Plaintiff avers that a reasonable attorney's fee in connection with this suit or action is the sum of \$100.00 and which it here- with claims.



Attorney for Plaintiff

RECEIVED

DEC 4 1970

CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

9728

First National
Bank of Mobile

vs.

Wayne Broadhead

James R. Owen

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Broadhead
DEPUTY SHERIFF

Received 4 day of March 19 71
and on 4 day of March 19 71
I served a copy of the within StC
on Wayne Broadhead
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Brown D. S.
50 mi R. T.
R-dolo