

ALABAMA FARM BUREAU : IN THE CIRCUIT COURT OF  
INSURANCE COMPANY, :  
A Corporation, : BALDWIN COUNTY, ALABAMA  
Plaintiff, : CIVIL DIVISION  
VS: :  
RAYMOND MCGROVE, : CASE NO. 9814  
Defendant. :

The plaintiff claims of the defendant TWO HUNDRED NINETEEN AND 68/100 (\$219.68) DOLLARS due from him by promissory note made by him on May 1, 1970, by which the defendant promised to pay to the plaintiff the total sum of THREE HUNDRED NINETEEN AND 68/100 (\$319.68) DOLLARS in installments of TWENTY-FIVE AND 00/100 (\$25.00) DOLLARS, the first installment due on May 1, 1970, and a like installment due on the 1st day of each month thereafter until fully paid.

Plaintiff avers that said note contained a provision that the failure to pay any installment when due would render the entire amount unpaid due and payable, and the defendant defaulted after paying ONE HUNDRED AND 00/100 (\$100.00) DOLLARS.

Plaintiff further claims benefit of waiver of exemptions as provided in said note, and claims a reasonable attorneys fee, as provided in said note, and plaintiff avers that a reasonable attorneys fee would be in the amount of SEVENTY-THREE AND 23/100 (\$73.23) DOLLARS.

Wherefore, the plaintiff claims judgment against the defendant in the amount of TWO HUNDRED NINETY-TWO AND 91/100 (\$292.91) DOLLARS with waiver of exemptions.

COLLINS, GALLOWAY & MURPHY

BY: 

Wilson M. Hawkins, Jr.  
ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:  
Box 118  
Stockton, Alabama

**FILED**

APR 29 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9814

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Raymond McGrove

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

Raymond McGrove, Defendant

by Alabama Farm Bureau Insurance Co., a corp.

Plaintiff

Witness my hand this 29th day of April 1971

Erinice B. Blackman, Clerk

No.....9814.....

Page.....

**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

ALABAMA FARM BUREAU INSURANCE COMPANY,

A Corporation

Plaintiffs

vs.

RAYMOND McGROVE

Defendants

**SUMMONS AND COMPLAINT**

Filed April 29, 1971

Entered in the Clerk

Collins, Galloway & Murphy

Plaintiff's Attorney

Defendant's Attorney

1/2 mi South of Stockton  
Defendant lives at 1971  
on Highway 285  
Box 113, Stockton, Alabama

Phone # 937-8646

Received In Office

May 20

April 30, 1971

Taylor Wilkins Sheriff

I have executed this summons

this

by leaving a copy with

Martha Adams miles at

for cents per mile total \$

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

day of May

Not failed to my county after diligent search and in

quity.

Taylor Wilkins Sheriff

W. A. (Jolbert) Deputy Sheriff

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9611

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Raymond McGrove .. Defendant.....

by Alabama Farm Bureau Insurance Co., a corp.

Plaintiff.....

Witness my hand this 29th day of April 1971

Eunice B. Blackburn Clerk

No..... Page.....

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

**CIRCUIT COURT**

Plaintiffs

vs.

Defendants

**SUMMONS AND COMPLAINT**

Filed ..... 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

19.....

Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

ALABAMA FARM BUREAU	:	IN THE CIRCUIT COURT OF
INSURANCE COMPANY,	:	BALDWIN COUNTY, ALABAMA
A Corporation,	:	
Plaintiff,	:	CIVIL DIVISION
VS:	:	
RAYMOND McGROVE,	:	CASE NO. <u>9814</u>
Defendant.	:	

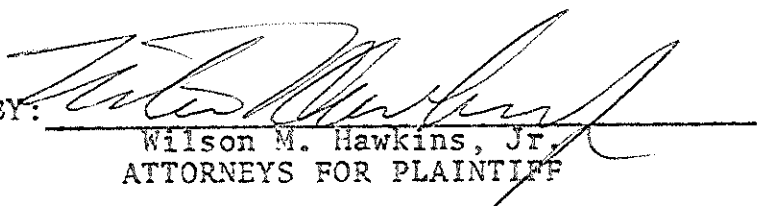
The plaintiff claims of the defendant TWO HUNDRED NINETEEN AND 68/100 (\$219.68) DOLLARS due from him by promissory note made by him on May 1, 1970, by which the defendant promised to pay to the plaintiff the total sum of THREE HUNDRED NINETEEN AND 68/100 (\$319.68) DOLLARS in installments of TWENTY-FIVE AND 00/100 (\$25.00) DOLLARS, the first installment due on May 1, 1970, and a like installment due on the 1st day of each month thereafter until fully paid.

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Wherefore, the plaintiff claims judgment against the defendant in the amount of TWO HUNDRED NINETY-TWO AND 91/100 (\$292.91) DOLLARS with waiver of exemptions.

COLLINS, GALLOWAY & MURPHY

BY:   
 Wilson M. Hawkins, Jr.  
 ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:  
 Box 118  
 Stockton, Alabama

**FILED**

APR 29 1971

EUNICE B. BLACKMON CIRCUIT CLERK

**COLLINS, GALLOWAY & MURPHY**

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1958)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

June 18, 1971

P. O. Box 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Eunice B. Blackmon  
Circuit Court Clerk  
Baldwin County Court House  
Bay Minette, Alabama

Re: Alabama Farm Bureau Insurance Co.  
Vs: Raymond McGrue  
Case No. 9814

Dear Mrs. Blackmon:

Please file the enclosed Amendment in the above referenced case. Would you please indicate that you have done this by returning the enclosed carbon copy of this letter in the self-addressed, stamped envelope.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY: 

Wilson M. Hawkins, Jr.

WMHJr/jk  
Enclosures

**FILED**

JUN 21 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW  
959 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

May 19, 1971

P. O. Box 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Eunice B. Blackmon  
Circuit Court Clerk  
Baldwin County Court House  
Bay Minette, Alabama

Re: Alabama Farm Bureau  
Vs: Raymond McGrove  
Case No. 9814

Dear Mrs. Blackmon:

Please issue an alias summons and complaint to the defendant at his place of residence which is located approximately one and one-half mile south of Stockton, Alabama on Highway 225. His phone number is 937-8646, if this will be of any assistance to the deputy.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:   
Wilson M. Hawkins, Jr.

WMHJr/jk



COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS

THOMAS M. GALLOWAY

M. THOMAS MURPHY (1924-1956)

ROBERT H. SMITH

WILSON M. HAWKINS, JR.

P. O. Box 4492

TELEPHONE

432-0568

AREA CODE 205

April 28, 1971

Mrs. Eunice B. Blackmon  
Circuit Clerk  
Baldwin County Court House  
Bay Minette, Alabama

9814

Re: Alabama Farm Bureau Insurance Co.  
Vs: Raymond McGrove

Dear Mrs. Blackmon:

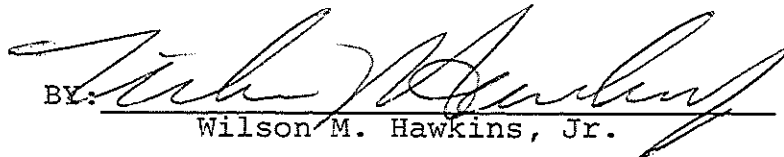
Please file the enclosed papers in the Circuit Court  
of Baldwin County.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:

  
Wilson M. Hawkins, Jr.

WMHJr/jk  
encl.

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

June 1, 1971

P. O. Box 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Eunice Blackmon  
Circuit Court Clerk  
Baldwin County Court House  
Bay Minette, Alabama

Re: Alabaaa Farm Bureau Insurance Co.  
Vs: Raymond McGrove  
Case No. 9814

Dear Mrs. Blackmon:

Please issue an alias summons and complaint to the defendant at his place of residence which is located approximately 1 and 1/2 miles south of Stockton, Alabama on Highway 225. It is our information that his box number is 118, Stockton, Alabama.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:   
Wilson M. Hawkins, Jr.

WMHJr/jk

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW  
958 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
ROBERT H. SMITH  
WILSON M. HAWKINS, JR.

July 20, 1971

P. O. Box 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Eunice B. Blackmon  
Circuit Court Clerk  
Baldwin County Court House  
Bay Minette, Alabama

Re: Alabama Farm Bureau  
Vs: Raymond McGrue  
Case No. 9814

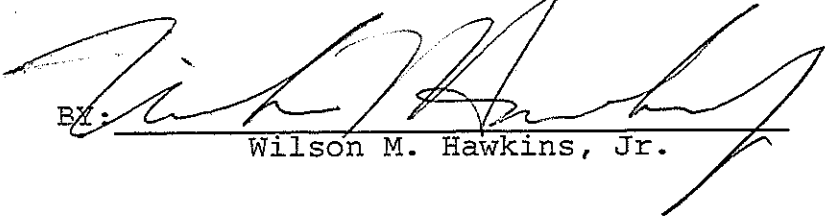
Dear Mr. Blackmon:

The above referenced law suit has been settled and  
I would appreciate it if you would dismiss it with prejudice.  
Please send the court costs bill to this firm.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:

  
Wilson M. Hawkins, Jr.

WMHJr/jk

ALABAMA FARM BUREAU  
INSURANCE COMPANY,  
A Corporation,

Plaintiff,

VS:

RAYMOND MCGROVE,

Defendant.

: IN THE CIRCUIT COURT OF  
: BALDWIN COUNTY, ALABAMA

: CIVIL DIVISION

:

: CASE NO. 9 8 1 4

:

AMENDMENT

Comes now the plaintiff in the above styled cause and amends his complaint as heretofore filed by substituting for the last name of the defendant mentioned above the name McGrue. The plaintiff avers that the defendant's name was erroneously written in the original complaint instead of his real name, which is Raymond McGrue, which is his true name and he was the one referred to in the original complaint and was the one that the plaintiff intended to sue, and is the one who signed the promissory note which is made a basis of the plaintiff's action.

The amendment being accomplished the plaintiff's complaint reads as follows:

ALABAMA FARM BUREAU  
INSURANCE COMPANY,  
A Corporation,

Plaintiff,

VS:

RAYMOND McGRUE,

Defendant.

: IN THE CIRCUIT COURT OF  
: BALDWIN COUNTY, ALABAMA

: CIVIL DIVISION

:

: CASE NO. 9 8 1 4

:

The plaintiff claims of the defendant TWO HUNDRED NINETEEN AND 68/100 (\$219.68) DOLLARS due from him by promissory note made by him on May 1, 1970, by which the

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COLLINS, GALLOWAY & MURPHY

BY: 

Wilson M. Hawkins, Jr.  
ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:

Box 118  
Stockton, Alabama

which is located approximately  
1 1/2 miles south of Stockton,  
Alabama on Highway 225.  
Defendant's telephone number  
is 937-8646

**FILED**

JUN 21 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

**SUMMONS AND COMPLAINT**

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

Circuit Court, Baldwin County

No. 9814

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Raymond McGrue

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.....

Raymond McGrue..... Defendant.....

by Alabama Farm Bureau Insurance Company a Corporation

..... Plaintiff.....

Witness my hand this 21st day of June 1971

Emmie B. Blackmon Clerk

No. 9814

Page.....

**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

ALABAMA FARM BUREAU INSURANCE

COMPANY, A CORPORATION

Plaintiffs

vs.

RAYMOND McGRUE

Defendants

**SUMMONS AND COMPLAINT**

Filed June 21, 1971

EUNICE B. BLACKMON Clerk

**FILED**

JUN 21 1971

EUNICE B. BLACKMON CIRCUIT CLERK

Collins, Galloway & Murphy  
Plaintiff's Attorney

Defendant's Attorney

JUN 21 1971

TAYLOR WILKINS  
SHERIFF

Defendant lives at

Box 118: Stockton, Ala.

Received In Office

June 21 1971

Sheriff

I have executed this summons

this June 22 1971  
by leaving a copy with

Raymond McGrue

Sheriff claims 22 miles at

Ten Cents per mile Total \$ 2.20

TAYLOR WILKINS, Sheriff

BY W. A. Tolbert  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Tolbert Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Stockton