

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

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 WILLIE LEE ADAMS and GEORGIA LEE ADAMS

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.....

..... WILLIE LEE ADAMS and GEORGIA LEE ADAMS Defendant.....

by MERIC CREDIT CORPORATION, INC. OF ALABAMA

..... Plaintiff.....

Witness my hand this..... 27th day of..... January..... 1972

James B. Blackman Clerk

No. 10,211

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MERIT CREDIT CORPORATION, INC.

OF ALABAMA

Plaintiffs

vs.

WILLIE LEE ADAMS and GEORGIA LEE ADAMS

Defendants

SUMMONS AND COMPLAINT

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

JAN 27 1972 Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

JAN 27 1972

John v. duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

74 Brownwood Avenue
Bay Minette, Alabama

Received In Office

January 27 1972
Taylor Wilkins Sheriff

I have executed this summons

this Jan 31 1972
by leaving a copy with

Willie Lee Adams
Georgia Lee Adams

Sheriff claims miles at

Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Zeller Deputy Sheriff

MERIT CREDIT CORPORATION, INC.)
OF ALABAMA,)

Plaintiff,)

vs)

WILLIE LEE ADAMS and GEORGIA LEE)
ADAMS,)

Defendants.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

10,211

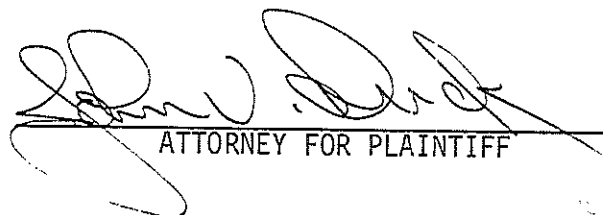
COUNT ONE

Plaintiff claims of the Defendants the sum of SIX HUNDRED SEVEN AND 25/100 (\$607.25) DOLLARS due by promissory note made by the Defendants on the 29th day of September, 1970 and payable in twenty-five (25) monthly installments of THIRTY-FIVE (\$35.00) DOLLARS each.

That in and by the terms of said note, the Defendants agreed that if a default was made in any one payment, the entire balance would be due and owing at the option of the holder, and the Plaintiff now claims the benefit of said option and declares the entire balance due and payable.

That in and by the terms of said note, the Defendants agreed to pay all costs of collection including a reasonable attorneys fee, and the Plaintiff now claims the further and additional sum of ONE HUNDRED TWENTY-FIVE (\$125.00) DOLLARS as a reasonable fee.

That in and by the terms of said note, the Defendants waived all rights of exemption under the Constitution and Laws as to personal property and home-
stead under the laws of Alabama, and the Plaintiff now claims the benefit of said waiver.


ATTORNEY FOR PLAINTIFF

FILED

JAN 27 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Eunice Blackmon
Bay Minette, Ala.

DATE January 25, 1972

Re: Merit Credit Corporation, Inc. of Alabama vs.

Willie Lee Adams and Georgia Lee Adams

Dear Mrs. Blackmon:

Enlosed please find Bill of Complaint to be filed
together with copies of same and Summons to be
served.

Sincerely,

John V Duck
(JH)

SIGNED

DATE

10, 211

SIGNED

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE _____ CIRCUIT _____ COURT

BALDWIN _____ COUNTY

CASE No. 10,211MERIT CREDIT CORPORATION, INC. OF ALABAMA, PLAINTIFF

VS

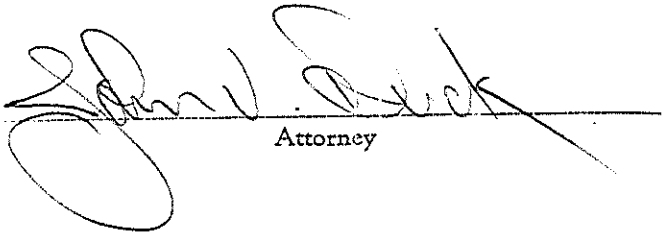
WILLIE LEE ADAMS and GEORGIA LEE ADAMS, DEFENDANT

Comes now the Plaintiff in the above styled cause and moves the court to enter a default judgment against the Defendant upon writ of inquiry, and assigns the following grounds:

1. Summons and complaint were personally served upon the Defendant on the 31st day of January, 1972.

2. The Defendant has failed to appear, demur, plead, or answer the said summons and complaint and has wholly defaulted.

3. More than thirty days has lapsed since said service.


Attorney

AMOUNT OF JUDGMENT \$ 582.25
ATTORNEY'S FEE \$ 125.00
INTEREST \$ _____
TOTAL \$ 707.25

FILED

MAY 22 1972

EUNICE B. BLACKMON CIRCUIT
CLERK