

STATE OF ALABAMA
COUNTY OF BALDWIN

Ø
Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON KENNETH E. NORTHCUTT, 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 THE BALDWIN NATIONAL BANK, A CORPORATION.

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

WITNESS MY HAND THIS 13 DAY OF March, 1972.

Eunice B. Blackmon
CLERK

BALDWIN NATIONAL BANK, A
CORPORATION,

PLAINTIFF

Vs.

KENNETH E. NORTHCUTT

DEFENDANT

Ø
Ø
Ø
Ø
Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO: 10,289

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF THREE HUNDRED
THIRTY ONE AND 12/100 (\$331.12) DOLLARS, DUE BY PROMISSORY NOTE
MADE BY HIM ON, HERETOFORE, TO-WIT, JUNE 6, 1969, WHICH SUM OF
MONEY, WITH INTEREST THEREON FROM TO-WIT, November 5/1969 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 FIFTY (\$50.00)
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 TO
PAY A REASONABLE ATTORNEY FEE, AND PLAINTIFF AVERS THAT SAID AMOUNT
IS A REASONABLE ATTORNEY FEE FOR THE BRINGING AND PROSECUTING OF

THIS SUIT.

BAILEY & TAYLOR

BY:

Robert E. Taylor
ATTORNEY FOR THE PLAINTIFF

FILED

MAR 13 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

CASE NO. 10,289

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

BALDWIN NATIONAL BANK, A
CORPORATION

Vs.

KENNETH E. NORTHCUTT

DEFENDANT

TO ANY SHERIFF OF THE
STATE OF ALABAMA.

DEFENDANT MAY BE SERVED AT:

C/O EMPEROR CLOCK CO.
FAIRHOPE, ALABAMA 36532

FILED

MAR 13 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

MAR 13 1972

JAYCOCK VILKINS
SHERIFF

Sherriff claims 70
Ten Cents per mile 71.00
JAYCOCK VILKINS, Sheriff
BY J. G. Cook
DEPUTY SHERIFF

Received 13 day of March 1972
and on 14 day of March 1972
I served a copy of this within
on Kenneth E. Northcutt
By service on K. E. Northcutt
TAYLOR VILKINS, Sheriff

MEMO-LETTER

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

MESSAGE

REPLY

TO

Mrs. Eunice Blackmon

Bay Minette, Ala.

DATE

DATE

April 17, 1972

Re: Baldwin Natl. Bank vs. Northcutt

Civil Case No. 10,289

Dear Mrs. Blackmon:

Enclosed please find Plea to be filed in captioned case.

Sincerely,

SIGNED

SIGNED

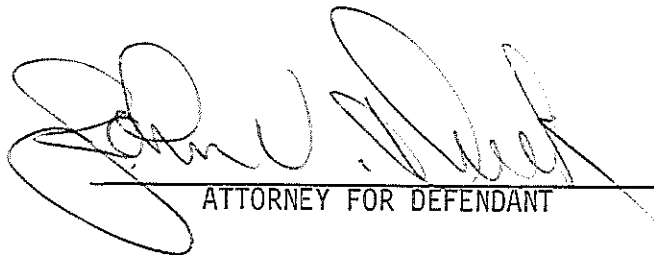
BALDWIN NATIONAL BANK, a corporation,)
Plaintiff,)
vs.)
KENNETH E. NORTHCUTT)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 10,289

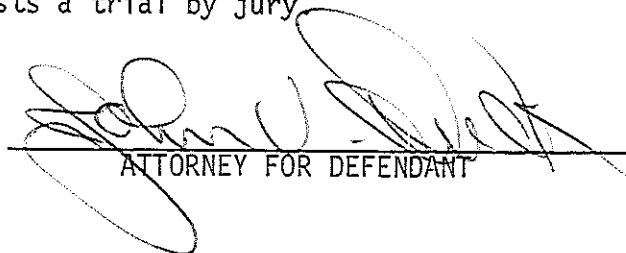
PLEA

Comes now the Defendant in the above styled cause, and for plea to the Bill of Complaint filed herein, assigns the following:

1. "Not guilty".

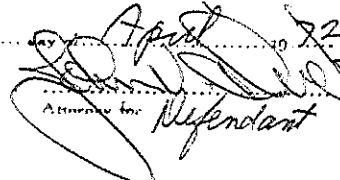

ATTORNEY FOR DEFENDANT

The Defendant respectfully requests a trial by jury


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

On 14 day of April 1972

Attorney for Defendant

FILED

APR 19 1972

EUNICE B. BLACKMON CIRCUIT CLERK