

STATE OF ALABAMA Ø
COUNTY OF BALDWIN Ø

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON ZENO GREEN AND LOUISE GREEN, 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 LIBERTY LOAN CORPORATION, A CORPORATION.

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

WITNESS MY HAND THIS 22 DAY OF MARCH, 1972.

Eunice B. Blackmon
CLERK

LIBERTY LOAN CORPORATION, Ø
A CORPORATION, Ø

IN THE CIRCUIT COURT OF

PLAINTIFF Ø

BALDWIN COUNTY, ALABAMA

Vs. Ø

AT LAW

ZENO GREEN AND LOUISE GREEN Ø

DEFENDANTS Ø

CASE NO: 10,313

COUNT ONE:

PLAINTIFF CLAIMS OF DEFENDANT THE SUM OF EIGHT HUNDRED FIFTY EIGHT AND 50/100 (\$858.50) DOLLARS, DUE BY PROMISSORY NOTE MADE BY HIM ON, HERETOFORE, TO-WIT, OCTOBER 30, 1970, WHICH SUM OF MONEY, WITH INTEREST THEREON FROM TO-WIT, JANUARY 1, 1972, 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 ONE HUNDRED TWENTY-FIVE (\$125.00) 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.

FILED

MAR 27 1972

EUNICE B. BLACKMON CLERK

BAILEY & TAYLOR

BY: *David B. Taylor*
ATTORNEY FOR THE PLAINTIFF

CASE No: 10,315
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

LIBERTY LOAN CORPORATION,
A CORPORATION

PLAINTIFF

Vs.

ZENO GREEN AND LOUISE
GREEN

DEFENDANTS

TO ANY SHERIFF OF THE STATE
OF ALABAMA:

DEFENDANTS MAY BE SERVED AT:

ROUTE 1, Box 137
BAY MINETTE, ALABAMA

FILED

MAR 27 1972

EUNICE B. BLACKMON
MAR 27 1972
CIRCUIT
CLERK

TAYLOR WALKINS
SHERIFF

Sheriff claims 16 miles by
Ten Cents per mile Total \$ 1.60
TAYLOR WALKINS
BY Robert
SHERIFF

Received 27 day of March 1972
and on 28 day of March 1972
I served a copy of this within 24
on Zeno Green; Louise
Green

By service on _____

TAYLOR WALKINS, Sheriff
BY W. A. Fullbright
4 miles west of Bay

ZENO GREEN and LOUISE GREEN,
Defendants.

AT LAW. NO. 10,315.

ANSWER:

Now come the Defendants in the above styled cause and for answer to the complaint heretofore filed against them, and to each count thereof, separately and severally, assigns the following separately and severally:

1. Not guilty.

J. Connor Owens, Jr.,
Attorney for Defendants.

I, the undersigned attorney of record for the Defendants in the foregoing cause do hereby certify that I have caused a copy of the foregoing answer to be served on Lloyd E. Taylor, the attorney of record for the Plaintiff in said cause, by placing the same in the United States Mail, postage prepaid, this 3rd day of May, 1972.

FILED

MAY 3 1972

EUNICE B. BLACKMON CIRCUIT CLERK

10,315