

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Geraldine Shiver 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 31 day of March, 1972.

Eunice B. Blackmon
Clerk

Defendant may be served at 106 Mitchell Avenue, Bay Minette.

* * * * *

FIRST NATIONAL BANK OF
MOBILE,

Plaintiff,

VS.

GERALDINE SHIVER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

10331


C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant Three Hundred Thirty-nine and 84/100 Dollars (\$339.84) due from her by account on the 1st day of September, 1971, 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 her by the use of a BankAmericard and finance charge 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 for action is the sum of \$50.00 and which it herewith claims.

COUNT TWO

The plaintiff claims of the defendant Three Hundred Thirty-nine and 84/100 Dollars (\$339.84) for money paid by the plaintiff for the defendant on the 1st day of September, 1971, at her 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 \$50.00 and which it herewith claims.



Attorney for Plaintiff

FILED

MAR 31 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

No 10,331

V

First National Bank of
mobile

vs

Geraldine Shivers

Mitchell 106
ave B Y

MAR 31 1972

JAYL

James R. Owen

Received 21 day of March 19 72
and on 25 day of April 19 72
I received copy of the within ATC
to Geraldine Shivers

By C. W. Shivers

C. W. Shivers
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First National Bank of
Mobile,

Plaintiff,

In the Circuit Court of
Baldwin County, Alabama
At Law

U.S.

Geraldine Shiver

Defendant.

Case No. 10331

1. In answer to the complaint and each count thereof
Defendant says;
- a. Not Guilty
 - b. Not indebted
 - c. For that said claim is usurious.

Geraldine Shiver
Rt 1 Box 542 H
Bay Minette, Alabama

Defendant request a trial jury.

Geraldine Shiver

FILED

MAY 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK