

FIRST NATIONAL BANK
OF FAIRHOPE, a banking
corporation,

Plaintiff.

vs.

T. G. WILLIAMS,

Defendant.

)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW

) Case No. 10,410

C O M P L A I N T

COUNT I.


Plaintiff claims of the Defendant the sum of EIGHTY-FIVE AND 78/100 (\$85.78) DOLLARS due by promissory note made by the Defendant on, to-wit, the 26th day of April, 1969, and payable to CHARLIE'S T.V. in fifteen (15) consecutive monthly installments beginning June 15, 1969 to CHARLIE'S T.V. and endorsed by CHARLIE'S T.V. to Plaintiff, and the Plaintiff avers that part of the consideration for said debt, the Defendant did waive his right to claim any exemption as to personal property which the Plaintiff also claims together with interest thereon.

COUNT II.

Plaintiff claims of the Defendant the sum of TWO HUNDRED TEN AND 80/100 (\$210.80) DOLLARS with interest thereon by promissory note made by the Defendant on, to-wit, the 2nd day of May, 1969, and payable in twelve (12) equal monthly installments beginning June 7, 1969, payable to CAREY & MIKE MOTOR COMPANY and endorsed by CAREY & MIKE MOTOR COMPANY to the Plaintiff in this cause, and the Plaintiff alleges that in said note, as part of the consideration, the Defendant did waive his right to claim any personal property as exempt to him which the Plaintiff also claims.

COUNT III.

Plaintiff alleges that as part of the consideration of said note, the Defendant did agree to pay a reasonable attorney's fee for the collection thereon, which the Plaintiff further claims in the sum of FORTY-FIVE AND NO/100 (\$45.00) DOLLARS.


E. G. RICKARBY, Attorney for Plaintiff.

Defendant's address is:

Point Clear, Alabama

MAY 19 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,410

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon T. G. Williams

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.....

T. G. Williams

Defendant.....

by First National Bank of Fairhope, a banking corporation

Plaintiff.....

witness my hand this 19th day of May 1972

Eunice B. Blackmon Clerk

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF FAIRHOPE, a
banking corporation

Plaintiffs

VS.

T. G. WILLIAMS

Defendants

SUMMONS AND COMPLAINT

Filed May 19, 1972

Eunice B. Blackmon Clerk

FILED

MAY 19 1972

EUNICE B. BLACKMON CIRCUIT CLERK

MAY 19 1972

TAYLOR WILKINS

Rickarby & Benton

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 20 May 1972

by leaving a copy with

J. H. Williams

Sheriff claims

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS Sheriff

BY Deputy Sheriff

Sheriff
Deputy Sheriff

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

May 17, 1972

Mrs. Eunice B. Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama

Re: First National Bank of Fairhope
vs. T. G. Williams

Dear Mrs. Blackmon:

Enclosed find suit on a promissory note in the above styled matter. Please process. I'm obliged.

Yours very truly,


E. G. Rickarby

EGR:lp
Enclosures

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

June 22, 1972

Hon. Telfair J. Mashburn
Judge of the Probate Court
Bay Minette, Alabama 36507

Re: First National Bank of Fairhope
vs. T. G. Williams; Case No. 10,410

Dear Sir:

Enclosed find two notes in this case. I am requesting judgment by default for \$327.75 with waiver which includes a \$31.17 attorney's fee. ~~Request you send me copy of judgment.~~

Yours very truly,


E. G. Rickarby

EGR:lp
Enclosures