

CHARLES D. SANKS, individ-
ually and d/b/a SANKS
CONSTRUCTION COMPANY,

Plaintiff,

VS.

ONEAL BOYINGTON &
IMOGENE BOYINGTON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 10,492


COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendants One Thousand Six Hundred Dollars (\$1,600.00), due by promissory note made by them on the 23rd day of February, 1972 and payable in 24 equal monthly installments beginning April 1, 1972, said Defendants having defaulted in the payment of said installments and said default having continued since April 1, 1972; which sum of money with interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendants One Thousand Six Hundred Dollars (\$1,600.00) damages for the breach of an agreement entered into by them on the 23rd day of February, 1972 by which they promised to pay to the Plaintiff the sum of One Thousand Six Hundred Dollars (\$1,600.00) in 24 equal monthly payments together with interest at the rate of 8% per anum beginning April 1, 1972 which agreement the Defendants have breached in that they have failed and refused to pay any of said installments as the same have come due.



E. E. Ball,
Attorney for the Plaintiff

Defendants address for service:

Oneal Boyington
Rt. 1
Perdido, Alabama (Dyas Community)

Imogene Boyington
Rt. 1
Perdido, Alabama

or

Eastwood-Nealley Company
Bay Minette, Alabama

FILED

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE 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 SummonOneal Boyington & Imogene Boyington.....

.....
.....
.....
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.....

.....Oneal Boyington & Imogene Boyington....., Defendant.....

by

.....Charles D. Sanks, individually and d/b/a Sanks....., Plaintiff.....
.....Construction Company.....

Witness my hand this.....14.....day of.....July.....1912
.....Ernest B. Blanton....., Clerk

38493

No. 10,492

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Charles D. Sanks

Plaintiffs

vs.

O'Neal Boyington & Inogene Boyington

Defendants

SUMMONS AND COMPLAINT

Filed *July 14* 19*72*

Eunice B. Blackmon Clerk

JUL 14 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

E. E. Ball

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office
RECEIVED

JUL 14 1972

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this *July 17* 19*72*

by leaving a copy with

O'Neal Boyington
Inogene Boyington

Sheriff claims *20* miles at

Ten Cents per mile Total \$ *2.00*

TAYLOR WILKINS Sheriff

BY *T. J. J. J.*

DEPUTY SHERIFF

Taylor Wilkins Sheriff

D. G. J. J. Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

10 miles north of Bay