

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James L. Driver and T. L. Fortenberry, individually and doing business as Bon Secour Marina, 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 South Baldwin Bank, a corporation.

WITNESS my hand this 4 day of Oct., 1972.

Emmie B. Blalock
Clerk

The defendant, James L. Driver, resides at Star Route B, Atmore, Alabama, Escambia County.

T. L. Fortenberry resides at Bon Secour, Alabama.

* * * * *

SOUTH BALDWIN BANK, a)
corporation,)

Plaintiff,)

VS.)

JAMES L. DRIVER and T. L.)
FORTENBERRY, individually and)
doing business as Bon Secour)
Marina,)

Defendants.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW 10,632

COMPLAINT


COUNT ONE

Plaintiff claims of the defendants Three Hundred Dollars (\$300.00) due from the defendants by a check drawn by the defendant, James L. Driver, on the State Bank of Jacksonville, Jacksonville, Florida, in favor of Bon Secour Marina for said amount on the 17th day of April, 1972, which said check was endorsed "Bon Secour Marina, T. L. Fortenberry" which was duly presented and payment refused, which said sum of money, with the interest thereon, is due and unpaid. Plaintiff claims the further sum of Forty-five

Dollars (\$45.00) as a reasonable attorney's fee in this cause in accordance with Title 7, Section 131(1) of the Code of Alabama.

COUNT TWO

Plaintiff claims of the defendants the sum of Two Hundred Dollars (\$200.00) due from the defendants by a check drawn by defendant, James L. Driver, on the State Bank of Jacksonville, Jacksonville, Florida, in favor of T. L. Fortenberry on the 17th day of April, 1972, which said check was endorsed to the plaintiff by the said T. L. Fortenberry which was duly presented and payment refused, which said sum of money, with the interest thereon, is due and unpaid. Plaintiff claims the further sum of Thirty Dollars (\$30.00) as a reasonable attorney's fee in this cause in accordance with Title 7, Section 131(1) of the Code of Alabama.


Attorney for Plaintiff

FILED

OCT 4 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

at 5 day of Oct. 1972
served a copy of the within all
on D. L. Fortenberry
By service on _____

Sheriff claims _____
Ten Cents per mile Total _____
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

Subscribed 12 day of Oct. 1972
that found in my county after diligent search and in _____

1-2-73
Executed by service on James T. Owen
Taylor Wilkins, Sheriff
By: JMBpd, Deputy

Taylor Wilkins, Sheriff
Carlisle Childress
Deputy Sheriff

J. R. OWEN,
Attorney for Plaintiff

EUNICE B. BLACKMON
CIRCUIT CLERK

OCT 4 1972

FILED

TAYLOR WILKINS
SHERIFF

OCT 5 1972

RECEIVED

Case # 10,632

SOUTH BALDWIN BANK, A CORPORATION
VS:
JAMES L. DRIVER & T. L. FORTENBERRY
Individually and doing business as
Bon Secour Marina,

FILED

OCT 4 1972

CLERK OF DISTRICT COURT

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James L. Driver and T. L. Fortenberry, individually and doing business as Bon Secourt Marina, 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 South Baldwin Bank, a corporation.

WITNESS my hand this 4th day of Oct, 1972.

Ernie B. Blackmon
Clerk

The defendant, James L. Driver, resides at Star Route B, Atmore, Alabama, Escambia County.

T. L. Fortenberry resides at Bon Secour, Alabama.—

* * * * *

SOUTH BALDWIN BANK, a)	
corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW 10,632
JAMES L. DRIVER and T. L.)	
FORTENBERRY, individually and)	
doing business as Bon Secour)	
Marina,)	
)	
Defendants.)	

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendants Three Hundred Dollars (\$300.00) due from the defendants by a check drawn by the defendant, James L. Driver, on the State Bank of Jacksonville, Jacksonville, Florida, in favor of Bon Secour Marina for said amount on the 17th day of April, 1972, which said check was endorsed "Bon Secour Marina, T. L. Fortenberry" which was duly presented and payment refused, which said sum of money, with the interest thereon, is due and unpaid. Plaintiff claims the further sum of Forty-five

Dollars (\$45.00) as a reasonable attorney's fee in this cause in accordance with Title 7, Section 131(1) of the Code of Alabama.

COUNT TWO

Plaintiff claims of the defendants the sum of Two Hundred Dollars (\$200.00) due from the defendants by a check drawn by defendant, James L. Driver, on the State Bank of Jacksonville, Jacksonville, Florida, in favor of T. L. Fortenberry on the 17th day of April, 1972, which said check was endorsed to the plaintiff by the said T. L. Fortenberry which was duly presented and payment refused, which said sum of money, with the interest thereon, is due and unpaid. Plaintiff claims the further sum of Thirty Dollars (\$30.00) as a reasonable attorney's fee in this cause in accordance with Title 7, Section 131(1) of the Code of Alabama.


Attorney for Plaintiff

FILED

OCT 4 1972

EUNICE B. BLACKMON CIRCUIT
CLERK