

**The State of Alabama**

Baldwin

**County****CIRCUIT COURT**

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Willie E. Scottto appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty days from service hereof to the complaint of Atlantic Finance Company, a corporationWitness, my hand this \_\_\_\_\_ day of February 19 56.

Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

**COMPLAINT**Atlantic Finance Company,a corporation

Plaintiff

Willie E. Scott

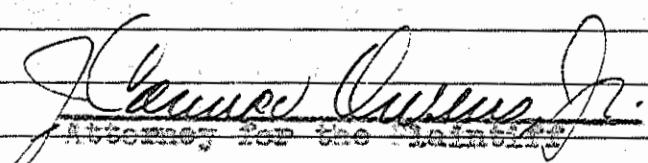
VS.

Defendant

The Plaintiff claims of the Defendant POUNDED AND UNPAID  
and 85/100 (\$131.65) Dollars, due  
by promissory note made by the defendant on the 21st day of  
October, 1955, and payable in 12 installments of \$11.35, every  
1st day of the month, beginning December 1, 1955, with and including  
interest, and assigned to the plaintiff on the 21st day of  
October, 1955, by the payee thereof, the Fitzgerald Motors.

Plaintiff further alleges that in and by the terms of said  
note, the defendant waived for himself, all rights of homestead  
and exemption under the laws of this State, and plaintiff claims  
the benefit of said waiver.

Plaintiff further alleges that in and by the terms of  
said note, the defendant agreed to pay a reasonable attorney's  
fee should such be necessary to collect said note, and plaintiff  
claims the additional sum of \$64.00 as a reasonable attorney's  
fee in the premises.

  
Attorney for the Plaintiff

Received 16 day of Feb 1956  
and on 16 day of Feb 1956  
I served a copy of the within A.C.  
on Willie E. Scott

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Will Scott D.S.

0 miles

No. 2852

**The State of Alabama**  
**Baldwin County**  
**CIRCUIT COURT**

Atlantic Finance Company

a corporation

vs. Plaintiff

Willie E. Scott

Defendant

**SUMMONS AND GENERAL COMPLAINT**

Filed this 19 day of

Clerk

J. Connor Owens, Jr.  
Plaintiff's Attorney.

**FILED**

FEB 15 1956

ALICE L. JACK, Clerk

Defendant waives all Standard  
Fees. Co.

Received this day of

19

Sheriff.

Executed this day of

19

by leaving a copy of the within Summons and  
Complaint with

Defendant

Sheriff.

**The State of Alabama**  
**County**

To the Sheriff of \_\_\_\_\_ County:

Whereas, the Plaintiff \_\_\_\_\_ in the within stated cause ha \_\_\_\_\_ made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the Complaint into your possession, unless the Defendant \_\_\_\_\_ give \_\_\_\_\_ bond payable to the Plaintiff \_\_\_\_\_ with sufficient surety in double the amount of the value of the property, with condition that if the defendant \_\_\_\_\_

cost in the suit \_\_\_\_\_  
within thirty days thereafter, deliver the property to the plaintiff \_\_\_\_\_ and pay all costs and damages which may accrue from the detention thereof.

Clerk