

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. Scott

to 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 corporation

Witness, 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

VS.

Willie E. Scott

Defendant

The Plaintiff claims of the Defendant FOUR HUNDRED AND TWENTY SEVEN AND 85/100 (\$431.85) Dollars, due by promissory note made by the defendant on the 21st day of October, 1955, and payable in 12 installments of \$46.35, 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.

Lawrence Curran, Jr. Attorney for the Plaintiff

Received 16 day of Feb 1956
and on 16 day of Feb 1956

Is a copy of the within acc
on Willie E. Scott

By service on _____

TAYLOR WILKINS, Sheriff
By Will Tolbert 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 _____ day of _____

19____

Clerk

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

FILED
FEB 15 1956

ALICE L. BUCK, clerk

Defendant works at Standard
Farm. 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 has 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 prop-
erty to the plaintiff _____ and pay all costs and
damages which may accrue from the detention
thereof.

Clerk.