

2981

BANK OF FAIRHOPE,
a banking corporation,

Plaintiff,

vs.

A. W. STAPLETON ET AL.,

Defendant.

I
I
I
I
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I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Come now the Defendants in the above styled cause, by their attorneys and for answer to the complaint heretofore filed against them, plead as following:

1. That the allegations of the complaint are untrue.

Respectfully submitted,

CHASON & STONE

By:

Marlene P. Stone

RECORDED

2921

BANK OF FAIRHOPE, a banking
Corporation,

Plaintiff,

vs.

A. W. STAPLETON ET AL.,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED PLEA

MAY 25 1956

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE
BAY MINETTE, ALABAMA

BANK OF FAIRHOPE, a Banking
Corporation,

PLAINTIFF

VS

A. W. STAPLETON and
WESLEY STAPLETON,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW


C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendants the sum of ONE THOUSAND DOLLARS (\$1,000.00) due by promissory note made by them on the 10th day of January, 1956, and payable on, to-wit, the 31st day of January, 1956, with interest thereon at the rate of 6% per annum from the making thereof, and the Plaintiff avers that in said note and as a part of the consideration, thereof, the Defendants have expressly waived their rights to claim personal property as exempt to them under the Constitution and Laws of the State of Alabama and agreed to pay an attorney's fee for the collection thereof, and the Plaintiff hereby claims the further sum of ONE HUNDRED AND FIFTY AND NO/100 DOLLARS (\$150.00) as such attorney's fee.

RICKARBY AND RICKARBY

BY


E. G. Rickarby, Jr.
Attorney for Plaintiff

LAW OFFICES
E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA
May 1, 1956

Mrs. Alice Duck
Clerk of Circuit Court
Baldwin County, Alabama

Dear Mrs. Duck:

Inre: Bank of Fairhope
Vs: Stapleton
Our File: 3677

With this we are handing you Summons and Complaint of
Bank of Fairhope vs Stapleton. Please process.

Yours very truly,



EGR/ts
Encl.
5-11-56

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

July 23, 1956

2921

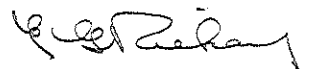
Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Bank of Fairhope
vs.
Stapleton & Stapleton
Our File: 3677

The Bank of Fairhope reports to me that this claim has been paid and I, therefore, request that you mark same dismissed on the docket, and send me a cost bill so I can present it to the Bank.

Yours very truly,



EGR/fm
8-1-56

cc: Bank of Fairhope

Mr. Norborne Stone
Attorney at Law
Bay Minette, Ala.

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 Summon A. W. STAPLETON and WESLEY STAPLETONto 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 A. W. STAPLETONAND WESLEY STAPLETON, Defendant.---by THE BANK OF FAIRHOPE, a Banking Corporation

, Plaintiff.---

Witness my hand this 4 day of May 1954Alice J. Shuck, Clerk