

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA
December 31, 1956

P. O. BOX 71

3/18

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

Dear Mrs. Duck:

In Re: Bank of Fairhope
-vs-
Mrs. I. D. Knoblock
Our File No. 3958

In the above mentioned matter, we are enclosing Summons and Complaint. Please process and oblige.

Yours very truly,



rl
Encl.
c/c Bank of Fairhope

1-25-57

BANK OF FAIRHOPE,
A Corporation,
Plaintiff

vs.

MRS. I. D. KNOBLOCK,
Defendant


) 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 Defendant the sum of ONE HUNDRED NINETY FOUR DOLLARS AND FIFTY-SIX CENTS (\$194.56), due by installment note made by her on the 11th day of October, 1956 and payable in nine (9) installments of \$21.61 each, payable on the 16th day of each month, beginning November, 1956 after date, without grace, and balance of \$21.68 payable August, 16th, 1957, and said note provides that default in the payment of any one payment of said note shall give the holder thereof the option of declaring the entire unpaid balance due and payable at once, and that said defendant defaulted in the payment of the installment due on the 16th day of December, 1956, and the plaintiff hereby declares the entire balance due and payable, after said default, and the Plaintiff avers that in the said note and as a part of the consideration thereof, the Defendant has expressly waived her rights to claim personal property as exempt to her under the Constitution and laws of the State of Alabama and agreed to pay an attorneys fee for the collection thereof and the Plaintiff hereby claims the further sum of THIRTY-FIVE DOLLARS (\$35.00) as such attorneys fee, and plaintiff further avers that said sum of money is still unpaid.

E. G. RICKARBY



Attorney for Plaintiff

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MRS. I. D. KNOBLOCK

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 _____

MRS. I. D. KNOBLOCK, Defendant

by _____

BANK OF FAIRHOPE, Plaintiff.....

Witness my hand this 2nd day of January 1957

Alvin J. Smith, Clerk