

COLLINS, GALLOWAY & MURPHY  
ATTORNEYS AT LAW  
FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA

AUGUST 29, 1957

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1925-1956)

3326

MRS. ALICE DUCK, CLERK  
CIRCUIT COURT OF BALDWIN COUNTY  
BALDWIN COUNTY COURT HOUSE  
BAY MINETTE, ALABAMA

RE: ALABAMA FARM BUREAU INS. Co.  
VS: DARRINGTON THOMPSON


DEAR MRS. DUCK:

I ENCLOSE HERewith THE COMPLAINT IN THE  
ABOVE STYLED MATTER AND WILL YOU PLEASE FILE  
SAME IN THE CIRCUIT COURT AND ADVISE ME OF SUCH  
FILING.

THANK YOU.

VERY TRULY YOURS,

COLLINS, GALLOWAY & MURPHY

BY:   
THOMAS M. GALLOWAY

TMG/FS  
ENCL:

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TMG/FS  
ENCL:

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No 326 -----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DARRINGTON THOMPSON

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 -----

DARRINGTON THOMPSON -----, Defendant

by Alabama FARM BUREAU INSURANCE Co. a Corp. -----

-----, Plaintiff

Witness my hand this 31st day of August 1957

Alvin D. Smith, Clerk

ALABAMA FARM BUREAU : IN THE CIRCUIT COURT OF  
INSURANCE CO., A CORP., :  
PLAINTIFF, : BALDWIN COUNTY, ALABAMA  
VS: :  
DARRINGTON THOMPSON, : NO. \_\_\_\_\_  
DEFENDANT. :

COUNT ONE

THE PLAINTIFF CLAIMS OF THE DEFENDANT TWO HUNDRED EIGHTY ONE AND 00/100 (\$281.00) DOLLARS, DUE BY PROMISSORY NOTE MADE BY HIM ON THE 21ST DAY OF JULY, 1956, BY THE TERMS OF WHICH NOTE DEFENDANT PROMISED TO PAY THE PLAINTIFF THE SUM OF FIVE HUNDRED ELEVEN AND 00/100 (\$511.00) DOLLARS IN MONTHLY INSTALLMENTS OF THIRTY AND 00/100 (\$30.00) DOLLARS EACH, FIRST SAID INSTALLMENT COMMENCING ON THE 21ST DAY OF JULY, 1956, AND A LIKE INSTALLMENT BEING DUE ON THE 21ST DAY OF EACH MONTH THEREAFTER UNTIL THE ENTIRE BALANCE PLUS INTEREST AT THE RATE OF EIGHT PER CENT (8%) WAS PAID IN FULL. PLAINTIFF ALLEGES THAT THE DEFENDANT MADE SEVEN PAYMENTS OF THIRTY AND 00/100 (\$30.00) DOLLARS UNDER THE TERMS OF SAID NOTE BUT HAS FAILED AND REFUSED TO MAKE OTHER PAYMENTS AS PROVIDED BY SAID NOTE.

PLAINTIFF FURTHER CLAIMS OF THE DEFENDANT THE SUM OF FIFTY AND 00/100 (\$50.00) DOLLARS AS AN ATTORNEY'S FEE, ABOVE SAID NOTE PROVIDING FOR A REASONABLE ATTORNEY'S FEE FOR THE COLLECTION OF SAID NOTE, AND PLAINTIFF ALLEGES THAT THE SUM OF FIFTY AND 00/100 (\$50.00) DOLLARS IS A REASONABLE ATTORNEY'S FEE. PLAINTIFF FURTHER

ALLEGES THAT UNDER THE TERMS OF THE ABOVE SAID NOTE  
DEFENDANT WAIVED ALL RIGHTS OF EXEMPTION DUE TO HIM  
UNDER THE CONSTITUTION AND LAWS OF THE STATE OF  
ALABAMA.

COLLINS, GALLOWAY & MURPHY

By: Sherrill M. Galloway  
ATTORNEYS FOR THE PLAINTIFF

ADDRESS OF DEFENDANT:

ROUTE 1, BOX 78-A  
BAY MINETTE, ALABAMA

ALABAMA FARM BUREAU : IN THE CIRCUIT COURT OF  
INSURANCE CO., A CORP., :  
: PLAINTIFF, : BALDWIN COUNTY, ALABAMA  
: :  
VS: :  
: NO. \_\_\_\_\_  
DARRINGTON THOMPSON, :  
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ALABAMA.

COLLINS, GALLOWAY & MURPHY

By: Henry W. Galloway  
ATTORNEYS FOR THE PLAINTIFF

ADDRESS OF DEFENDANT:

ROUTE 1, Box 78-A  
BAY MINETTE, ALABAMA

*Filed 8-13-57*

*Not seen*

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
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Circuit Court, Baldwin County

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by Alabama FARM BUREAU INSURANCE Co. a Corp. .....

....., Plaintiff .....

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W. J. Duck ....., Clerk