

G.M. LAMBERT, as Assignee  
of the FIRST NATIONAL BANK  
OF BAY MINETTE, a corporation,

Plaintiff

vs.

A.D. LAMBERT, JR.,

Defendant

IN THE CIRCUIT COURT OF

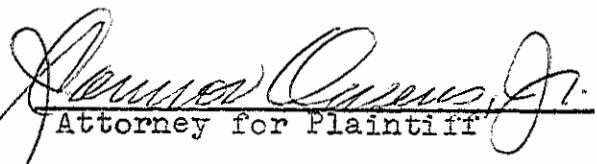
BALDWIN COUNTY, ALABAMA

IN LAW

The plaintiff claims of the defendant the sum of \$102.50, due by promissory note made by him on the 2nd day of June, 1956, and payable in two installments of \$51.25 each on the 2nd day of July, 1956, and the 2nd day of August, 1956, which note was payable to the First National Bank of Bay Minette, Bay Minette, Alabama, and which note was for a valuable consideration before maturity, assigned to the plaintiff, together with interest thereon from date.

Plaintiff further alleges that in and by the terms of said note, the defendant waived all rights of homestead and exemption under the laws of the State of Alabama, 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 all costs of collection including a reasonable attorney's fee, and plaintiff claims the additional sum of \$15.00 as an attorney's fee in the premises.

  
Attorney for Plaintiff

*Entered July 23, 1958*

## SUMMONS AND COMPLAINT

CIRCUIT COURT, BALDWIN COUNTY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. ....

TERM, 19.....

3610

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon A. D. Lambert, Jr.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 \_\_\_\_\_A. D. Lambert, Jr., Defendant .....by G. M. Lambert, Plaintiff .....Witness my hand this 15 day of July 1958

179

Alice J. Luck, Clerk

Received 16 day of July 1958  
and on 23 day of July 1958  
I served a copy of the within A. D. Lambert  
on A. D. Lambert

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

TAYLOR WILKINS, Sheriff  
By W. A. Lambert D. S.  
o mi

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW. NO. 3618

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G. M. LAMBERT  
Plaintiff  
vs.  
A. D. LAMBERT, JR.  
Defendant

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SUMMONS AND COMPLAINT

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FILED  
JUL 15 1958  
ALICE J. DUCK, Clerk

J. CONNOR OWENS, JR.  
ATTORNEY AT LAW  
101 Court House Square  
BAY MINETTE, ALABAMA