

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3636

TERM, 19...

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon E.D. Byrd and Iris Byrd

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

E.D. Byrd and Iris Byrd, Defendant .S...

by First National Bank of Bay Minette, a national banking association, Plaintiff.....

Witness my hand this 7 day of August 1958.

Alice J. Luck, Clerk

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff

vs.

E.D. BYRD and
IRIS BYRD,

Defendants

IN THE CIRCUIT COURT OF

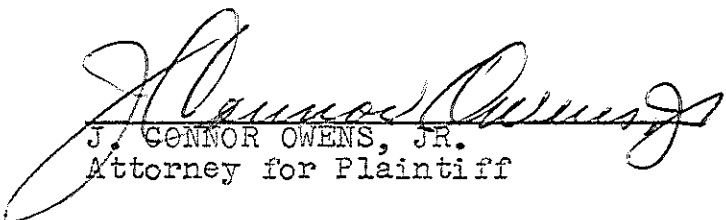
BALDWIN COUNTY, ALABAMA

IN LAW

Plaintiff claims of the Defendants the sum of \$247.69 the balance due on a promissory note made by the Defendants on the 16th day of April, 1955, and payable in 35 equal installments of \$30.84 each, and another at \$31.10, beginning the 15th day of May, 1955, with interest thereon.

Plaintiff further alleges that in and by the terms of said note, the Defendants 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 Defendants agreed to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the additional sum of \$36.00 as an attorney's fee in the premises.


J. CONNOR OWENS, JR.
Attorney for Plaintiff

Received 8 day of Aug 1958
and on 13 day of Aug 1958
served a copy of the within SV C
on E. D. Byrd and Iris Byrd

by service on _____
TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
Perdido

Sheriff claims 26 miles at
Ten Cents per mile Total \$ 2.60
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

3636 ✓

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

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff

vs.

E. D. BYRD and IRIS BYRD,

Defendants

SUMMONS AND COMPLAINT

FILED
AUG 7 1958
ALICE J. DUCK, Clerk

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

Defendants live at Perdido