E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA

August 14, 1959



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

Dear Mrs. Duck:

Enclosed find Complaint, please attach summons on it and have it served on Mrs. Beatrice Seaman who works at Olens! Department Store and lives at Mullet Point, next door to the Fenches.

Yours very truly,

EGR/bs cc: J. G. Bennett

Enclosure

NOTE

W.E.N. Com	Date
For value received. It	we promise to pay to the order
KUTAL FINANCE SERVICE, INC., 3	51 M. Wilson Avenue, Prichard, Alabama
the sum of Mulle Hund	DOLLARS (\$/300)
in Sweekly Installments of \$ monthly	the first installment due 3-1-5
and the final installment due	, with interest at 8% per annum. Failure to pay any
installment hereon due shall entitle the holder hereof to declare all in	stallments due and payable without notice. We are over the age of 21 years
and we secure this debt by the following described property:	
HAM AND	52 Stude # 982741
·	
and against any adverse claim. The makers, co-makers, endorsers, su notice of protest, suit and all other requirements necessary to hold the constitution and laws of the State of Alabama or any other state in the I	is note the personal property listed above, warranted free of all encumbrances reties or guarantors of this note severally waive demand, presentment, protest, em and expressly waive as to this debt, all rights to claim exemptions under the United States; and they agree that the time of payment may be extended without he undersigned pays said indebtedness as herein agreed this conveyance shall
Loan 937 Charges 367 9/	Loan Nº 266
Beatrice dean	- Bestive Seuman (Seal)
Name of Borrower	3 Signature of Bornswer Market 2) Montres
Witness	(Seal)
Name of Person Making Loan	and the second of the second o

sine received. Hwe promise to pay to the order

than one in without Average, Prichard, Malana

initialiment hereon doe shall entitle the bridge hereof to declare all invinitarence due and payable without notice. We are ever the age of all years AND The Man Matchinest one

and we accure this debt by the following described propositi

de property.

And the control of the notice to them of such extension. Upon condition however, that if constituation and lawn of the State of Mahama or any other state. merico of protest, suit and all other requirements necessary and against any adverse chain. The makers, co-ambers, endersor

and with interest to Dily gon assenting Radione to Day 800.

Name of Bottower

ROYAL FINANCE, SERVICE, INJ., a corporation

Plaintiff.

-75-

PRATRICK SHARAS

Defendant.

IN THE CIRCUIT COURT OF BULDWIN COUNTY, ALABAMA AT LAW.

COMPLAINT

Count One

The Plaintiff claims of the Defendant Two HUMDRED and TWENTY-TWO AND 09/100 (\$222.09) DOLLARS, due by a Promissory Note made by Defendant on the 31st day of January 1956; which was payable in Abstallments of FIFTY AND NO/100 (\$50.00) DOLLARS per month; the first of said installments being due on the 5th day of March 1956 and the remaining installments each month thereafter until the Note has been paid in full. Plaintiff avers that the said Note is now due in its entirety and unpaid, WHEREPOUR FARIETTER.

Elaintiff avers that the Defendant in said Note waives all exemptions due her under the Laws of the State of Alabama.

E. G. RICKARBY Attorney for Plaintiff ROYAL FINANCE, SERVICE, INC. a corporation

Plaintiff

-VS-

BEATRICE SEAMAN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

ANSWER

Comes now the Defendant in the above styled cause, and for answer to the Bill of Complaint filed, says:

Not Guilty:

Attorney for Defendant

Defendant demands a trial by Jury.

FILE 10

ALUE I DUN, REGISTER

Jury

OCT 28 339

AUCE I. DUCK, REGISTER

ROYAL FINANCE, SERVICE, INC., a corporation

Plaintiff.

-VS-

BEATRICE SEAMAN

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW.

COMPLAINT

Count One

The Plaintiff claims of the Defendant TWO HUNDRED AND TWENTY-TWO AND 09/100 (\$222.09) DOLLARS, due by a Promissory Note made by Defendant on the 31st day of January 1956; which was payable in installments of FIFTY AND NO/100 (\$50.00) DOLLARS per month; the first of said installments being due on the 5th day of March 1956 and the remaining installments each month thereafter until the Note has been paid in full. Plaintiff avers that the said Note is now due in its entirety and unpaid, WHEREFORE PLAINTIFF SUES.

Plaintiff avers that the Defendant in said Note waives all exemptions due her under the Laws of the State of Alabama.

EILED

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ALCE L DUCK CLERK REGISTER

E. G. RICKARBY Attorney for Plaintiff

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The State of Alabama, Baldwin County.	Circ	uit Court, Baldwin Co	ounty
Baldwin County.) No		TERM, 19
TO ANY SHERIFF OF THE ST	ATE OF ALABAMA:	in the second second	. *
You Are Hereby Commanded to St	mmon Beatrice	Seaman	
to appear and plead, answer or dem	ur, within thirty days from t		
the Circuit Court of Baldwin County	v, State of Alabama, at Bay	Minette, against	
Beatrice Seaman			_, Defendant
by Royal Finance Serv	rice_Ins		** ** * * * * * * * * * * * * * * * *
	••••••••		, Plaintiff
Witness my hand this 17th	day of August	19 <u>59</u>	
	allica	J. Ducke	, Clerk
			

No. 39342 Page	Defendant lives at
The State of Alabama Baldwin County	
CIRCUIT COURT	Received In Office
ROYAL FINANCE SERVICE, INC	, Sheriff
Plaintiffs vs. BEATRICE SEAMAN	I have executed this summons this
Defendants	Bealise Seamen
Summons and Complaint	et telescope de la companya del companya de la companya del companya de la compan
Filed 8-17- 19 59 Alice J. Duck Clerk	Sheriff claims Ten Cents per mile Total 5 TAYLOR WILKINS, Sheriff
	BY DEPUTY SHERIFF
Plaintiff's Attorney	Saylor Wilkins Sheriff
Defendant's Attorney	Saylor Welsuis Sheriff Edlugh Steathan Deputy Sheriff

Mult Penet
Defendant lives at
Received In Office
<u> </u>
, Sheriff
I have executed this summons
10-14- 1959
ving a copy with