

11091

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MAURICE L. CLARK to appear within thirty days from the service of this writ in the Circuit Court to be held for said county at the place of holding the same, then and there to answer the complaint of TAYLOR WILKINS.

Witness my hand this 4 day of December, 1959.

Alice J. Clark  
Clark

TAYLOR WILKINS  
PLAINTIFF  
VS  
MAURICE L. CLARK  
DEFENDANT

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

1.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED EIGHTY FOUR and 52/100 (\$284.52) DOLLARS balance due on a certain promissory note executed on the 16th day of January, 1958, and payable in twelve monthly installments of \$23.71 each beginning February 16, 1958, and payable to the Baldwin County Bank or order. The Plaintiff avers that he endorsed this note for the Defendant, who is the maker thereof. That said endorsement was made in order to lend his credit thereto. The Plaintiff avers that the Defendant defaulted in the payment of said note at the time it became due and because of his endorsement the Plaintiff was forced to pay the same in full. The Plaintiff further avers that he is now the holder and owner of said note; that it was assigned and transferred to him by the Baldwin County Bank. The Plaintiff further avers that the said note is due and unpaid. The Plaintiff further avers that the note sued on provides for payment of all counsel fees in connection with the collection of this debt and the Plaintiff avers that \$50.00 is a reasonable counsel fee for the collection of the same.

Wiltens & Brantley

BY: William M. Brantley  
Attorneys for the Plaintiff

FILED  
DEC 4 1959  
ALICE J. CLARK

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Received 4 day of Dec 1959  
and on 15 day of June 160  
I served a copy of the within 240  
on Maurice L. Clark

By service on \_\_\_\_\_  
Ray D. Bridges  
TAYLOR WILKINS, Sheriff  
By J. W. Floyd D. S.

TAYLOR WILKINS  
PLAINTIFF  
VS  
15 Fed  
MAURICE L. CLARK  
DEFENDANT

1267 yellow hammer Dr  
whs for Doran Propellers Co

BILL OF COMPLAINT

RETURNED 1-12-60  
Not found in my County after dili-  
gent search and inquiry.  
RAY D. BRIDGES, Sheriff  
By J. Payne D. S.

FILED  
DEC 4 1959  
ALICE J. DUCK, Clerk