MOBILE ELECTRICIANS FEDERAL CREDIT UNION,

IN THE CIRCUIT COURT OF

a Corporation,

IRVING L. STAMPS.

BALDWIN COUNTY, ALABAMA

Plaintiff, :

AT LAW

VS:

: :

NO.

Defendant

COUNT ONE

Plaintiff claims of Defendant the sum of ONE HUNDRED FIFTY SIX AND 39/100 (\$156.39) DOLLARS, due by promissory note made by him on, to-wit, January 25, 1957, which provided for payment by consecutive monthly installments of FIFTY AND 00/100 (\$50.00) DOLLARS each, to commence on, to-wit, February 25, 1957. Said note further provides that upon failure to pay any installment when due, the entire sum shall, at the option of the holder, become due and payable. Plaintiff avers that it has exercised its option and declared the entire sum due and payable, the Defendant having defaulted in the payment due in, to-wit, July 1957 and all subsequent payments. Plaintiff further avers that in said note Defendant did agree to pay, as a delinquent penalty, a fine of two (2) cents on each unpaid dollar per month while delinquent, and Plaintiff claims further the sum of THIRTY SIX AND 00/100 (\$36.00) DOLLARS, as the total of such fine. Defendant further agreed to pay a reasonable attorney's fee which might ensue as a cost of collection upon default of Defendant, and Plaintiff claims the sum of FIFTY AND 00/100 (\$50.00) DOLLARS, as a reasonable attorney's fee.

Plaintiff further avers that in said note Defendant did waive all right in and to his exemption of personal property under the Constitution and laws of the State of Alabama and Plaintiff claims the benefit of such waiver.

WHEREFORE, Plaintiff claims of Defendant the sums hereinabove set out, with interest thereon.

WILLIAM H. McDERMOTT

Attorney for Plaintiff

Address of Defendant:

210 West Ninth Street Bay Minette, Alabama



Plaintiff's Attorney

Defendant's Attorney

W. a. Talbert Sheriff.

Ome Deputy Sheriff.

No4456 Page	
STATE of ALABAMA  Baldwin County	Defendant lives at
CIRCUIT COURT	Received In Office
MOBILE ELECTRICIANS FEDERAL	19/19, 1960
CREDIT UNION, A CORP.	32.1
Plaintiffs	Sheriff.  I have executed this summons
vs.	this 200 13 3 160
IRVING L. STAMPS	by leaving a copy with
 Defendants	Joving L Stamps
Summons and Complaint	
Filed October 19, 19 60	
Alice J. Duck Clerk	
Clerk	
•	
Plaintiff's Attorney	2116-11)01:
	Sheriff.
Defendant's Attorney	W. U. Jalbert
	Deputy Sheriff.

## WILLIAM H. MCDERMOTT

ATTORNEY AT LAW

FIRST NATIONAL BANK BUILDING

## MOBILE, ALABAMA

HEMLOCK 8-4461

October 18, 1960

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

In re: Mobile Electricians

Federal Credit Union

Vs: Irving L. Stamps

Dear Mrs. Duck:

Enclosed herewith are original and one copy of a complaint and I would appreciate it if you would cause them to be filed in the Circuit Court of Baldwin County on the law side.

I would be indeed appreciative if you would forward to this office a card indicating the date that this complaint is filed and the date of service upon the defendant.

Respectfully yours,

WILLIAM H. McDERMOTT

WHMcD: cm Encl.