

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon A. B. McDILL and CLEVE HYATT 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, Alabama, at the place of holding same by MOBILE POWER BRAKE AND EQUIPMENT, INC., an Alabama corporation.

Witness my hand this the 11 day of January, 1961.

*Bessie J. Duck*  
Clerk

\* \* \* \* \*

COMPLAINT

MOBILE POWER BRAKE AND  
EQUIPMENT, INC., an  
Alabama corporation,

PLAINTIFF,

VS:

A. B. McDILL  
and  
CLEVE HYATT,

DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The plaintiff claims of the defendants TWO HUNDRED SIXTY & 00/100 DOLLARS (\$260.00) due by promissory note made by them on the 16th day of September, 1960, and payable on the 16th day of December, 1960, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$50.00.

*Willie P. 11/12*  
Attorney for Plaintiff

The defendants's address is ~~is~~

Bay Minette, Alabama

**FILED**

JAN 11 1961

ALICE J. DUCK, CLERK  
REGISTER

*64-1-12-61*  
*2-23-61*

4545  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

MOBILE POWER BRAKE AND EQUIPMENT  
INC., and Alabama corporation,  
PLAINTIFF

VS:

A. B. McDILL and CLEVE HYATT  
DEFENDANTS

SUMMONS AND COMPLAINT

Received 11 day of Jan 1961  
and on 12 day of Jan 1961  
I served a copy of the within  
on A. B. McDill  
Cleve Hyatt  
By service on A. B. McDill 1-12-61  
Cleve Hyatt 1-23-61

Sheriff claims 86 miles at  
Ten Cents per mile Total \$ 8.60  
TAYLOR WILKINS, Sheriff  
BY Chelress  
DEPUTY SHERIFF

FILED  
JAN 11 1961  
ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

MOBILE POWER BRAKE AND  
EQUIPMENT, INC., An  
Alabama Corporation,

Plaintiff,

vs.

A. B. McDILL, ET AL.,

Defendants.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4545

PLEA:

Comes now the Defendant A. B. McDill in the above styled cause, by his attorneys, and for answer to the complaint heretofore filed against him pleads as follows:

1. The allegations of the complaint are untrue.

CHASON & STONE

FILED

JAN 30 1961

ALICE L. DUCK, CLERK  
REGISTER

By:

  
Attorneys for Defendant A. B. McDill

MOBILE POWER BRAKE AND EQUIP-  
MENT, INC., An Alabama Cor-  
poration,

Plaintiff,

vs.

A. B. McDILL, ET AL.,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4545

\* \* \* \* \*

PLEA

\* \* \* \* \*

FILED  
JAN 30 1961  
JAMES L. DICK, CLERK  
BAY MINETTE, ALABAMA

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

4545  
\$ 260<sup>00</sup> Bay Minette Alabama Sept 16 1960

We, A.B. Mc Dill & Cleve Hyatt after date without grace promise to pay to the order

Mobile Power Brake & Equipment, Inc

Two hundred & sixty & <sup>70</sup>/<sub>100</sub>

DOLLAR

for value received, in lawful money of the United States of America, with interest from

at the rate of \_\_\_\_\_ per cent per annum until paid.

Payable at

Office Forrest Christian, Foley, Ala -  
The parties to this instrument, whether maker, endorser, surety, or guarantor, each for himself, hereby severally waive as to this debt, or a renewal thereof, all rights of exemption under the Constitution and Laws of Alabama, as to personal property, and they each severally agree to pay all costs of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise. And the maker, endorser, surety or guarantor of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them and they agree that time of payment may be extended without notice to the funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them. All suits for the collection of this note may be prosecuted in any county in this State that the payee or assignee elects.

Witness OUR hand and seal the 16 day of Sept. 1960

Witness A.B. Mc Dill

Witness Cleve Hyatt

No. \_\_\_\_\_ Due \_\_\_\_\_

A.B. Mc Dill (SEA)  
Cleve Hyatt (SEA)