

4251

BANK OF FAIRHOPE, ALABAMA  
A Corporation,

PLAINTIFF

VS

MRS. FRANKIE DUNAWAY

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COMPLAINT

The PLAINTIFF claims of the DEFENDANT the sum of ONE HUNDRED NINETY-TWO DOLLARS AND FORTY SEVEN CENTS (\$192.47) due by promissory note made by her, on to wit, the 27th day of September, 1958 for the original sum of FIVE HUNDRED EIGHTY DOLLARS AND FIFTY SIX CENTS (\$580.56) in twenty-four installments of TWENTY-FOUR DOLLARS AND NINETEEN CENTS (\$24.19) payable on the 28th day of each consecutive month being October 28, 1958. Said note contains a provision that "Default in the payment of any one payment of this note shall give the holder hereof the option of declaring the entire unpaid balance due and payable at once" and the DEFENDANT defaulted in a payment of said note and the PLAINTIFF declared the entire unpaid balance of ONE HUNDRED NINETY-TWO DOLLARS AND FORTY-SEVEN CENTS (\$192.47) due with the interest thereon.

The PLAINTIFF further avers that as part of the consideration in said note, the DEFENDANT did waive, as to this debt, her right to claim any personal property as exempt to her and did agree to pay a reasonable attorney's fee for the collection of this note which the PLAINTIFF claims in the further sum of FIFTY DOLLARS (\$50.00).

  
ATTORNEY FOR THE PLAINTIFF

DEFENDANT'S address is:

Daphne, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. ....

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mrs. Frankie Dunaway

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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 .....

Mrs. Frankie Dunaway ....., Defendant .....

by The Bank of Fairhope, A Corporation ....., Plaintiff .....

Witness my hand this 10 day of May 1960

Alice J. Wick ....., Clerk

No. 4751

Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

The Bank of Fairhope  
A Corporation

Plaintiffs

vs.

Mrs. Frankie Dunaway

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_  
Clerk

E. G. Rickarby  
Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

Defendant lives at  
Daphne, Alabama

Received In Office

*May 10* 19 *60*

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with \_\_\_\_\_

\_\_\_\_\_  
Sheriff

\_\_\_\_\_  
Deputy Sheriff

BANK OF FAIRHOPE, ALABAMA  
A Corporation,

PLAINTIFF

VS

MRS. FRANKIE DUNAWAY

DEFENDANT

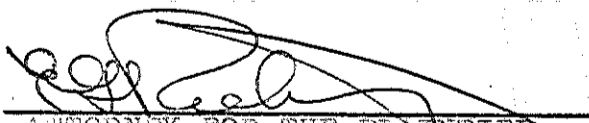
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

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ATTORNEY FOR THE PLAINTIFF

DEFENDANT'S address is:  
Daphne, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. ....

..... TERM, 19..

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to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
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Mrs. Frankie Dunaway ....., Defendant .....

by The Bank of Fairhope, A Corporation .....

....., Plaintiff .....

Witness my hand this 10 day of May 1960

Cliff Hester ....., Clerk

No. 17251

Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

The Bank of Fairhope

A Corporation

Plaintiffs

vs.

Mrs. Frankie Dunaway

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_, Clerk

E. G. Rickarby

Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

May 10 1940

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

*Returned unexecuted  
by order of Attorney  
E. G. Rickarby*

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

LAW OFFICES  
**E. G. RICKARBY**  
BANK BUILDING  
FAIRHOPE, ALABAMA

May 11, 1960

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

Dear Mrs. Duck:

Re: Bank of Fairhope  
Vs: Mrs. Frankie Dunaway  
Our File: 5094

Request you ask the sheriff to return the papers  
in the suit of Bank of Fairhope vs. Mrs. Frankie  
Dunaway, and send me a bill for the costs incurred  
to date, and oblige.

Yours very truly,



E. G. RICKARBY,  
Attorney for Plaintiff.

EGR/ts  
cc: (dup) Bank of Fairhope