

4273

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William S. Todd 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 same, then and there to answer the complaint of Zurich Insurance Company, a corporation.

Witness my hand this 31 day of May, 1960.

Reed J. Hark
Clerk

ZURICH INSURANCE COMPANY a
corporation,

Plaintiff,

vs.

WILLIAM S. TODD,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant Two Hundred and Two Dollars and Twenty-six Cents (\$202.26), as the assignee of a note executed on the 29th day of December, 1959 by the Defendant payable to Gulf Life Insurance Company, payable in monthly installments of Twenty-five Dollars (\$25.00) each beginning February 1, 1960 and which said note provided that should default be made in the payment of any one of said installment the whole of the unpaid balance thereof would, at the option of the holder thereof, be declared immediately due and payable. The Plaintiff further alleges that the Defendant did default in the payment of the installment due February 1, 1960 and the balance due under said note has been, and is hereby, declared immediately due and payable, as provided in said note. And the Plaintiff further alleges that the said Gulf Life Insurance Company did assign said note to it on May 2, 1960 and that said note and the debt evidenced thereby, is the property of this Plaintiff is is due and unpaid.

CHASON & STONE
By: *Malone S. Stone*
Attorneys for Plaintiff

#4273

ZURICH INSURANCE COMPANY, a
corporation,

Plaintiff,

VS.

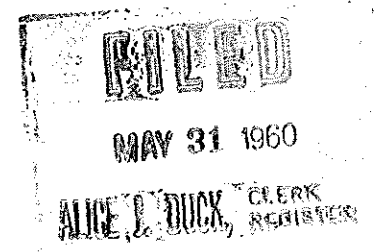
WILLIAM S. TODD,

Defendant.

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

SUMMONS AND BILL OF COMPLAINT

Defendant's Address: Bay Minette, Ala.



LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Received 3/ day of May 1960
d on 1 day of June 1960
served a copy of the within Dec
Wm. S. Todd

service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
o me