

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

May 30th, 1961

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

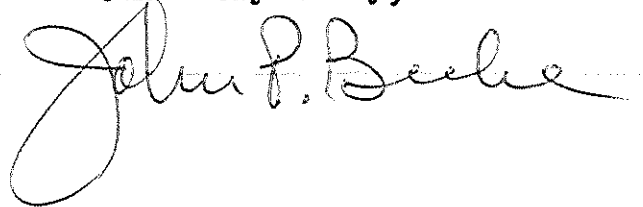
Re: Production Credit vs. Gullledge,
No. 4636 - Civil Docket

Dear Mrs. Duck:

I enclose answer and demand of the defendant in the above
entitled cause for jury trial for filing in this cause.

I have also mailed to Mr. J. Connor Owens, Jr., Bay Min-
ette, Alabama, a copy of this answer.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".

BAY MINETTE PRODUCTION CREDIT
ASSOCIATION, a national fram
loan association,
Plaintiff,

vs

W. M. GULLEDGE,
Defendant.


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 4636


Comes the Defendant in the above entitled cause and for
answer to the complaint filed therein says that the allegations of
the complaint are untrue.


Attorney for Defendant

The Defendant demands trial by jury

I, John P. Beebe, attorney for the Defendant, hereby
certify that a true and exact copy of the foregoing answer was
this day mailed, postage prepaid, to Mr. J. Connor Owens, Jr.,
attorney for the Plaintiff, Bay Minette, Alabama.

This the 30th day of May, 1961.


Attorney for Defendant

FILED
JUN 1 1961
ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4636

MARCH TERM, 1961

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon W.M. GULLEDGE

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

W.M. GULLEDGE....., Defendant.

by BAY MINETTE PRODUCTION CREDIT ASSOCIATION, a national farm
loan association....., Plaintiff.

Witness my hand this 15 day of March 1961.

Exp-5-3-61 Alice J. Luck....., Clerk
Defendant resides in Rosinton, Alabama.

No. _____ Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

BAY MINETTE PRODUCTION CREDIT
ASSOCIATION, a national farm
loan association,

Plaintiffs

vs.

W.M. GULLEDGE

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rosinton Community

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____
by leaving a copy with

Sheriff.

Deputy Sheriff.

BAY MINETTE PRODUCTION CREDIT
ASSOCIATION, a national farm
loan association,

PLAINTIFF

VS.

W.M. GULLEDGE,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SEVEN HUNDRED and NO/100 (\$1,700.00) DOLLARS, due by promissory note made by him on the 2nd day of October, 1959, and payable on the 1st day of October, 1960, with interest thereon at the rate of SEVEN AND THREE QUARTERS (7 3/4%) PERCENT per annum.

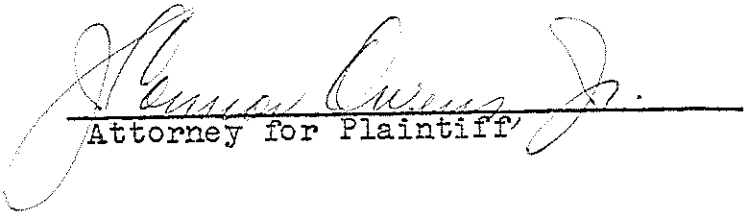
Plaintiff further alleges that in and by the terms of said note, that the Defendant waived all right to exemption under the Constitution and Laws of the State of Alabama, and Plaintiff claims the right of such waiver.

Plaintiff further alleges that in and by the terms of said note, the Defendant agreed to pay a reasonable attorney's fee should suit be necessary for collection, and the Plaintiff claims the further and additional sum of \$255.00 as a reasonable attorney's fee in the premises.

FILED

MAR 15 1961

ALICE J. DUCK, Clerk


Attorney for Plaintiff

Received 16 day of May 1961
d on 33 day of May 1961
served a copy of the within W.M. Gullledge

service of
TAYLOR WILKINS, Sheriff
By Edleigh H. Hardman D.S.

Robertsdale, Ala.

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Ed.
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 4636.

BAY MINETTE PRODUCTION CREDIT
ASSOCIATION, a national farm
loan association,

PLAINTIFF,

VS.

W.M. GULLEDGE,

DEFENDANT.

SUMMONS AND COMPLAINT

FILED
MAR 15 1961
ALICE L. DUCK, CLERK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
Dahlberg Building
BAY MINETTE, ALABAMA