

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE,
A National Banking Association,

Plaintiff,

Vs.

FRANKIE M. DUNAWAY,

Defendant.

IN THE CIRCUIT COURT
OF
BALDWIN COUNTY, ALABAMA

Case No. 4656

COUNT ONE

Complainant claims of the defendant the sum of, to-wit, FOUR HUNDRED FORTY THREE & 80/100 DOLLARS (\$443.80), balance due by promissory note made by the defendant on, to-wit April 27, 1960 and payable in eighteen (18) installments beginning on, to-wit, May 20, 1960. Plaintiff further alleges that in said note, and as a part of the consideration thereof, the defendant agreed that in the event of default in the payment of any one of said installments when due, the holder of said note shall have the right to declare the entire indebtedness immediately due and payable, and the plaintiff alleges that there has been a default in the payment of said installments, and the plaintiff has elected to declare the entire indebtedness due and payable.

The plaintiff further alleges that in said note and as a part of the consideration thereof, the defendant waived all rights of exemption under the Constitution and Laws of the State of Alabama, and agreed to pay all costs of collection or securing or attempting to collect or secure said note, including a reasonable attorney's fee, which attorney's fee the plaintiff alleges to be One Hundred & No/100 Dollars (\$100.00), which further sum the plaintiff claims of the defendant.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By: *[Signature]*

Attorneys for the Plaintiff

The defendant may be served at:
Daphne, Alabama.

FILED

MAR 28 1961

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4656

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Frankie M. 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

Frankie M. Dunaway, Defendant

by The American National Bank & Trust Company of Mobile, a National Banking Association,

Plaintiff

Witness my hand this 28 day of March 1961

Alice J. Duck, Clerk

85180

No. 4656 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

THE AMERICAN NATIONAL BANK & TRUST

COMPANY OF MOBILE, A National banking
Association Plaintiffs

vs.

FRANKIE M. DUNAWAY

Defendants

Summons and Complaint

Filed March 28, 19 61

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

3-28 1961
Taylor Wilkins Sheriff

I have executed this summons

this 19 April 1961

by leaving a copy with

Frankie M. Dunaway

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY

Barner

DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. O. Barner Deputy Sheriff

Daphne

85180
No. 4656 Page

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Baldwin County

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BY Garner
DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. O. Garner Deputy Sheriff
Daphne

HAMILTON, DENNISTON, BUTLER & RIDDICK

ATTORNEYS & COUNSELLORS AT LAW

AMERICAN NATIONAL BANK BUILDING

P.O. BOX 1671

MOBILE, ALABAMA

March 27, 1961

THOMAS A. HAMILTON
ROBERT P. DENNISTON
CHARLES R. BUTLER
HARRY H. RIDDICK
ROBERT R. LOCKLIN
MILLER A. WIDEMIRE

PETER HAMILTON (1838-1888)
THOMAS A. HAMILTON (1844-1897)
J. GAILLARD HAMILTON (1899-1956)

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

Dear Mrs. Duck:

Enclosed please find the carbon and the original copy
of a suit which we wish to file against Frankie M. Dunaway of
Daphne, Alabama. We would appreciate it if you would file this
suit for us.

Thank you very much for your kind attention.

Very truly yours,


For the Firm

OJL/gth
Enclosures

cc: Mr. Hugh Lawson
American National Bank & Trust Co.