

JAMES A. BRICE

ATTORNEY AT LAW

BOX 298 • FOLEY, ALABAMA • WM 3-3681

5616

MESSAGE

REPLY

TO

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

DATE June 26, 1963

Enclosures: Summons and Complaint

Pittsburgh National Bank

vs

George E. Dunkle and Ruth N.
Dunkle

James A. Brice
James A. Brice

BY

710. 5616

DATE

6-27-63

Case filed.

You forgot to
send deposit for
cost on out of
state plaintiffs
so I will hold
on my desk
until further
orders

A. J. R.

SIGNED

RECIPIENT KEEP THIS COPY, RETURN WHITE COPY TO SENDER

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

WHITEHALL 3-3601

P.O. Box 298

August 12, 1963

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Pittsburgh National Bank
Vs: George E. Dunkle and Ruth N. Dunkle
At Law No. 5616

Dear Mrs. Duck:

According to my records, plaintiff in the above styled action is entitled to judgment by default.

Kindly place the file before Judge Hall and request that he enter judgment by default for plaintiff for \$1,265.17 principal, \$202.42 interest, \$190.00 as attorney fee, a total of \$1,657.59.

The promissory note upon which the suit is based is herewith enclosed. Kindly send me a certified copy of judgment.

Thank you.

Sincerely,


James A. Brice

JAB:j
Enclosure

PITTSBURGH NATIONAL BANK

PLAINTIFF

VS

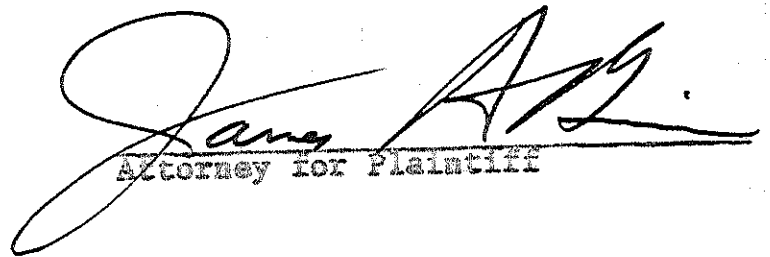
GEORGE E. DUNKLE AND RUTH
N. DUNKLE

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

The undersigned, as attorney for plaintiff, acknowledges
himself as surety for costs.


Attorney for Plaintiff

FILED

JUL 10 1933

WILLIAM L. DUNKLE, CLERK
REGISTER

PITTSBURGH NATIONAL BANK

PLAINTIFF

VS

GEORGE E. DUNKLE AND RUTH
N. DUNKLE

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The undersigned, as attorney for plaintiff, acknowledges
himself as surety for costs.


Attorney for Plaintiff

FILED

JUL 10 1966

ALICE J. DUCK, CLERK
REGISTER

PITTSBURGH NATIONAL BANK,

PLAINTIFF

VS

GEORGE E. DUNKLE AND RUTH

N. DUNKLE,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

72v. 5616

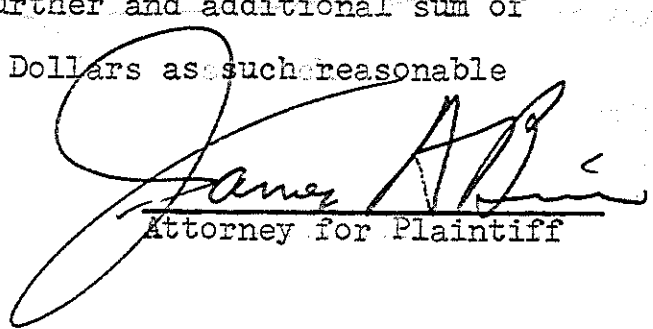
COMPLAINT

The Plaintiff claims of the Defendants the sum of One Thousand Two Hundred Sixty-five and 17/100 (\$1,265.17) Dollars, due by promissory note made by the Defendants on the 26th day of June, 1961, and payable on demand, with interest from the 30th day of July, 1961 at the rate of eight (8%) per cent per annum.

The Plaintiff claims of the Defendants the sum of One Thousand Two Hundred Sixty-five and 17/100 (\$1,265.17) Dollars, due by promissory note made by the Defendants on the 26th day of June, 1961, and payable on demand, with interest from the 30th day of July, 1961 at the rate of eight (8%) per cent per annum.

Plaintiff avers that in and by the terms of said note the Defendants waived all right to exemption under the constitution and laws of Alabama, and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the Defendants agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of One Hundred Ninety (\$190.00) Dollars as such reasonable attorney's fee.


Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon George E. Dunkle and Ruth N. Dunkle

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 -----

George E. Dunkle and Ruth N. Dunkle-----, Defendant S.

by Pittsburgh National Bank-----

-----, Plaintiff-----

Witness my hand this 27 day of June 19 63

Exp-7-8-63 Beige Muck-----, Clerk

No. 5616

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Pittsburgh National Bank

Plaintiffs

vs.

George E. Dunkle and Ruth N.
Dunkle

Defendants

Summons and Complaint

Filed

FILED

JUN 27 1963

ALICE L. DICK

**CLERK
REGISTER**

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

July 2, 1963

Sheriff.

I have executed this summons

this 7-8-63 19__
by leaving a copy with

George E. Dunkle
Ruth N. Dunkle

144

Sheriff claims 72 miles at 144

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

Jm Eastburn
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Jm Eastburn

Deputy Sheriff.

Foley, Ala.

No. **247638**PERSONAL LOAN **28.73**\$ **1432.34****JUN 26 1961 19**

PITTSBURGH, PA.,

30 months after date, for value received, the undersigned jointly and severally promise to pay, without defalcation, to the order of PITTSBURGH NATIONAL BANK, Pittsburgh, Pa., the sum of **Fourteen Thousand Three Hundred Thirty Two and 34/100** Dollars

(**\$1432.34**) in equal monthly instalments of \$ **29⁰⁰ 48.00** and continuing on the same day of each month thereafter until the full amount is paid. In the event that any instalment shall not be paid when due, the undersigned agrees to pay, in addition to such instalment, such late charges as are now authorized by law. beginning on **July 30**, 19**61**

Upon failure to make any payment as herein agreed, or default in any other condition of this or any other obligation of any of the undersigned to the holder hereof, or in the event of the issuance of any attachment against or levy upon property of the undersigned or upon the death, insolvency, bankruptcy or failure in business of any of the undersigned, this note shall at the option of its holder become immediately due and payable, without demand or notice. The undersigned jointly and severally waive protest in event of this note maturing and being unpaid in whole or in part.

If this note be not paid at maturity, or at its accelerated maturity as agreed herein, the undersigned and each and any of them do hereby jointly and severally empower any attorney above payee or any holder hereof against the undersigned or either or any of them and, with or without declaration filed, confess judgment in favor of the all errors and without stay of execution; and inquisition and extension upon any levy is hereby expressly waived and condemnation agreed to, and the exemption of all property from levy and sale on any execution hereon is also hereby expressly waived and no benefit of exemption is to be claimed under and by virtue of any exemption law now in force or which may be hereafter passed by any State or Nation.

ADDRESSES: (give complete address)

Box 582, Foley, Alabama**25-1020**

SIGNATURES: (write in full)

Borrower **George E. Dunkle** (Seal)Wife or Husband of Borrower **Ruth N. Dunkle** (Seal)

3. Co-maker (Seal)

4. Co-maker (Seal)