

HUGH ROZELLE
ATTORNEY-AT-LAW
ATMORE, ALABAMA 36502

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December 15, 1966

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

Re: First National Bank of Bay Minette,
A National Banking Association

Vs: Harrison Valree

Dear Mrs. Duck:

I am enclosing, herewith, answer in connection with
the above mentioned suit on promissory note.

With best personal regards, I am

Sincerely,



HUGH ROZELLE

HR/mm

Enc: Answer

FIRST NATIONAL BANK OF BAY MINETTE,)	
A National Banking Association,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
HARRISON VALREE,)	
Defendant.)	LAW SIDE.
	<i>no 7285</i>

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIFTY ONE AND 50/100 DOLLARS (\$451.50), the balance due by Promissory Note made by him on December 16, 1964, and payable in 24 installments, commencing on January 15, 1965, with interest thereon from August 20, 1966; Plaintiff further alleges that in and by the terms of said note the failure to pay any installment accelerated the balance due under said note, and that said Defendant defaulted in his obligation to pay the installments as set out hereinabove.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of homestead under the Laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the further and additional sum of \$65.00 as a reasonable attorney's fee in the premises.

Walter S. Felt

Attorney for Plaintiff.

FILED
NOV 25 1966
BALDWIN COUNTY, ALA.

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

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 SummonHARRISON VALREE.....

.....806 Park Avenue.....

.....Bay Minette, Alabama.....

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.....

.....Harrison Valree.....

....., Defendant.....

byFirst National Bank of Bay Minette, a National Banking.....

.....Association.....

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

Witness my hand this.....23.....day of.....November.....19..66..

.....*Lilice J. Luck*..... Clerk

24: 11-28-66

No. 72-88

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association

Plaintiffs

vs.

HARRISON VALREE

Defendants

SUMMONS AND COMPLAINT

Filed November 23, 1966.

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

806 Park Avenue

Bay Minette, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this Nov 28, 1966

by leaving a copy with

Harrison Valree

4 40

W A Jellert

Sheriff

Deputy Sheriff

FIRST NATIONAL BANK OF BAY MINETTE,
A National Banking Association,

Plaintiff,

VS:

HARRISON VALREE,

DEFENDANT.

0 IN THE CIRCUIT COURT OF

0 BALDWIN COUNTY, ALABAMA

0 LAW SIDE.

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Now comes the Defendant and for answer to the Plaintiff's
complaint and to each count thereof separately and severely says:

1. That the allegations of the Complaint are untrue.

Hugh Rozelle
HUGH ROZELLE
ATTORNEY FOR DEFENDANT

FILED

DEC 22 1966

RECORDED
CLERK