

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

*Attorney at Law*

FAIRHOPE, ALABAMA 36532

February 1, 1967

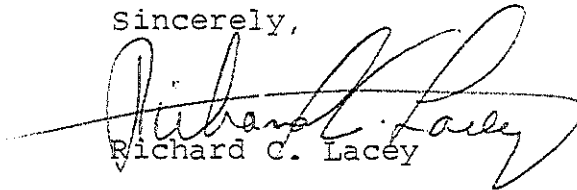
Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette Courthouse  
Bay Minette, Alabama

Re: Two (2) Cases -  
Baldwin National Bank of Robertsdale,  
a corporation VS. Jane Lores

Dear Mrs. Duck:

Enclosed please find answers in subject cases.

Sincerely,



Richard C. Lacey

RCL:mw

Encls.

BALDWIN NATIONAL BANK OF  
ROBERTSDALE, a corporation,

Plaintiff,

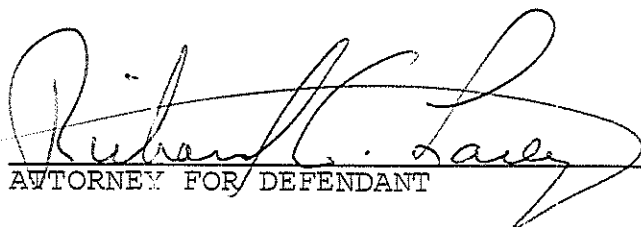
VS.

JANE LORES,

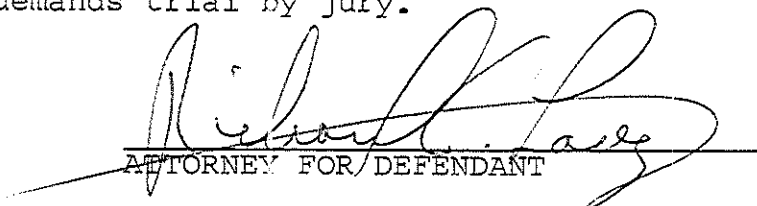
Defendant.

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW  
) CASE NO. \_\_\_\_\_  
)  
)

Comes the Defendant in above styled cause and for answer  
to the complaint, saith that she is not guilty of the matters  
alleged therein.

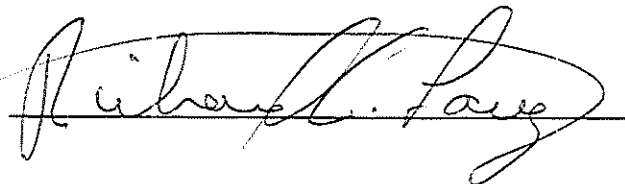
  
ATTORNEY FOR DEFENDANT

Defendant respectfully demands trial by jury.

  
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 1 day of  
February, 1967, served a copy of the foregoing pleading  
on counsel for all parties to this proceeding by mailing the same  
by United States mail, properly addressed, and first class postage  
prepaid.



FILED  
FEB 3 1967  
ALICE J. DICK  
CLERK  
REGISTER

BALDWIN NATIONAL BANK OF )  
ROBERTSDALE, a corporation, )  
Plaintiff, )  
vs. )  
JANE LORES, )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

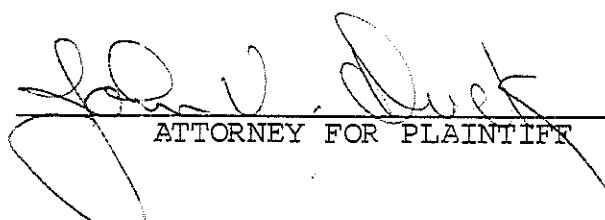
NO. 7335

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY-FIVE (\$525.00) DOLLARS due by promissory note made by her on the 28th day of September, 1965 and payable on the 28th day of October, 1965 with the interest thereon.

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 the Plaintiff claims the further and additional sum of SEVENTY-FIVE (\$75.00) DOLLARS as a reasonable attorney's fee.

That in and by the terms of said note, the Defendant waived all rights of exemption under the Constitution and laws of Alabama, and the Plaintiff now claims the benefit of said waiver.

  
ATTORNEY FOR PLAINTIFF

FILED

JAN 9 1967

WELLS FARGO BANK

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 Summon JANE LORES

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.....

JANE LORES

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

by BALDWIN NATIONAL BANK OF ROBERTSDALE

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

Witness my hand this 9 day of Jan 1967.

Clerk

Executed  
1-12-67  
J. J. G. Williams  
Clerk of the Court

No. 17335

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BALDWIN NATIONAL BANK OF

ROBERTSDALE, a corporation

Plaintiffs

vs.

JANE LORES

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Silverhill, Alabama

RECEIVED  
Received in Office

JAN 9 1967

19.....

TAYLOR WILKINS

DEPUTY SHERIFF

Sheriff

I have executed this summons

this 12th day of January, 1967

by leaving a copy with

*James H. H. H.*

Sheriff claims

60

miles at

Ten Cents per 100 Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY

*Calvin C. H. H.*

DEPUTY SHERIFF

Sheriff

Deputy Sheriff