

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

Attorney at Law

FAIRHOPE, ALABAMA 36532

May 11, 1967

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

7/6 ~~2/11/67~~
7518

Re: Atlantic Discount Corp.
Vs.
Willie Lee Pettaway
Margaret Pettaway
Cherry Lee Pettaway

Dear Mrs. Duck:

Enclosed please find summons and Complaint in subject case.
Please file and have served.

Thank you.

Sincerely,

Richard C. Lacey
Richard C. Lacey (true)

RCL:mw

Encls.

ATLANTIC DISCOUNT CORPORATION,)
a corporation,)

Plaintiff,)

vs.)


WILLIE LEE PETTAWAY, MARGARET
PETTAWAY and CHERRY LEE PETTAWAY,)
jointly and individually,)

Defendants.)

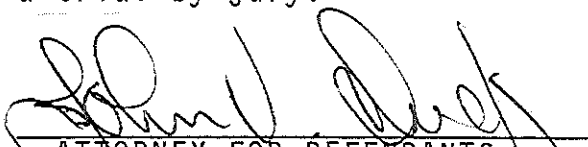
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 7518

Comes now the Defendants in the above styled cause, and
for answer to the Bill of Complaint filed herein says:

"Not Guilty".


ATTORNEY FOR DEFENDANTS

Defendants respectfully demand
a trial by jury.

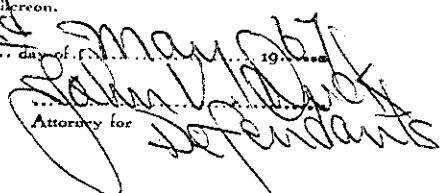

ATTORNEY FOR DEFENDANTS

FILED
MAY 25 1967
ALICE L. DUCK, CLERK

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel
for the opposing party in the foregoing matter with a copy
of this pleading by depositing in the United States Mail
a copy of same in a properly addressed envelope with
adequate postage thereon.

This 23rd day of May, 1967


Attorney for
Defendants

ATLANTIC DISCOUNT CORPORATION,)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	AT LAW
VS.)	CASE NO. <u>7518</u>
WILLIE LEE PETTAWAY, MARGARET)	
PETTAWAY and CHERRY LEE)	
PETTAWAY, jointly and indivi-)	
dually,)	
Defendants.)	

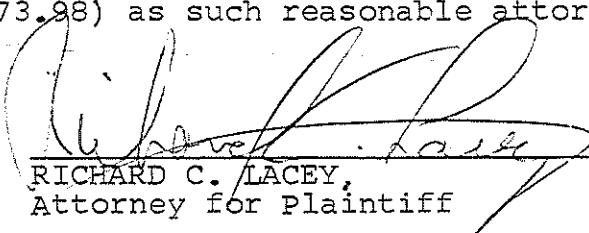
BILL OF COMPLAINT

The Plaintiff claims of the Defendants the sum of ONE THOUSAND THREE HUNDRED SIXTY-NINE and 90/100 DOLLARS (\$1,369.90) due by promissory note, made by Defendants on December 21, 1966, of which the sum of ONE THOUSAND THREE HUNDRED SIXTY-NINE and 90/100 DOLLARS (\$1,369.90) with the interest thereon is still unpaid.

Plaintiff further avers that in and by the terms of said note, the Defendants agreed to pay interest at the rate of eight percent (8%) per annum from maturity, and Plaintiff claims of the Defendants such interest.

Plaintiff further avers that in and by the terms of said note, the Defendants waive notice of presentment and all right of exemption under the Constitution and Laws of Alabama, or any other state, as to personal property, as to which waiver the Plaintiff now claims the benefit.

Plaintiff further avers that in and by the terms of said note, the Defendants agreed to pay all costs of collection or securing or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendants the further and additional sum of TWO HUNDRED SEVENTY-THREE and 98/100 DOLLARS (\$273.98) as such reasonable attorney's fee.


RICHARD C. LACEY,
Attorney for Plaintiff

Defendants reside at:
Fairhope, Alabama

FILED

JAN 22 1967

ALICE L. DICK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

7578 Circuit Court, Baldwin County
No. ~~663~~

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonWillie Lee Pettaway, Margaret Pettaway
.....and Cherry Lee Pettaway.....
.....
.....

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.....

Willie Lee Pettaway, Margaret Pettaway and Cherry Lee Pettaway
....., Defendant.s..

byAtlantic Discount Corporation, a corporation.....

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

Witness my hand this.....12.....day of.....May.....1967

.....*Bevis J. Smith*....., Clerk

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No. 7578

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Atlantic Discount
Corp.

Plaintiffs

vs.

Willie Lee Pettaway
Et Als

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAY 12 1967

Clerk

ALICE L. DICK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

MAY 12 1967 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Willie Lee Pettaway 5-13-67
Margaret Pettaway 5-15-67
Cherry Lee Pettaway 5-12-67
J. Lyle

Sheriff claims 210 miles at

Ten Cents per mile Total \$ 21

TAYLOR WILKINS, Sheriff

BY Ron Randall
DEPUTY SHERIFF

Gayln Wilkins Sheriff
Ron Randall Deputy Sheriff

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