

PACE HOLLAND COMPANY,
A Corporation,

Plaintiff,

vs.

N. E. WALLACE and JOYCE
WALLACE,

Defendants.

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1.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

The Plaintiff claims of the Defendants the sum of SIX HUNDRED NINETY-TWO and 95/100 (\$692.95), balance due on a promissory note made by the Defendants on the 6th day of November 1965 and payable in 22 monthly installments of \$25.00 or more, the first being due and payable January 6, 1966. The Plaintiff avers, that the Defendant defaulted in the payment of this installment and all subsequent monthly installments and that the whole balance has become due and payable. The Plaintiff claims interest at the rate of 6% per annum from November 6, 1965, this being provided for in the terms of said promissory note. The Plaintiff further avers, that the Defendant agreed in said promissory note to pay all expenses including a reasonable attorneys fee incurred in collecting the same, and the Plaintiff claims a reasonable attorneys fee in the amount of ONE HUNDRED TWENTY-FIVE DOLLARS (\$125.00).

WILTERS, BRANTLEY & NESBIT

BY:

Stephen S. Nesbit
Attorneys for the Plaintiff

N. E. Wallace is employed by Laidlaw Contracting Company or Laidlaw Road Builders, Mobile, Alabama.

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 N. E. Wallace and Joyce Wallace

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.....

..... N. E. Wallace and Joyce Wallace, Defendant.....

by Pace Holland Company

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

Witness my hand this..... 1 day of..... June 19 67

6-1-67

Cliff A. Smith Clerk

No. 7541

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Page Holland Company

Plaintiffs

vs.

8/1/67
N. E. Wallace and Joyce Wallace
Defendants

SUMMONS AND COMPLAINT

Filed JUN 1 1967

Clerk

WILTERS, BRANTLEY & NESBITT

Plaintiff's Attorney

Defendant's Attorney

is employed
Defendant lives at
Lardlow Contracting Co. on
Lardlow Road Builders

Mobile, Alabama

Received In Office

RECEIVED

JUN 1 1967

DAVID WILKINS Sheriff

I have executed this summons

this 19

by leaving a copy with

6-8-67

N. E. Wallace

L. Jackson D.S.

6-29-67

Joyce Wallace

L. Hopkins D.S.

Ray Le Bridges

Sheriff

Deputy Sheriff