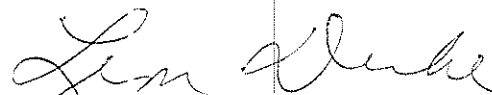


PACE HOLLAND COMPANY, a	:	IN THE CIRCUIT COURT
corporation,		
		OF BALDWIN COUNTY
Plaintiff,	:	ALABAMA
VS.	:	
		CIVIL DIVISION
MRS. J. B. HOLLY,	:	
Defendant.	:	CASE NO. 7806

INTERROGATORIES TO PLAINTIFF

Comes now the defendant in the above styled cause and propounds the following interrogatories to the plaintiff:

1. Please attach to the answers to these interrogatories a copy of the note sued upon.
2. Please attach to the answers to these interrogatories a statement of all payments made on said note and the date of each payment.

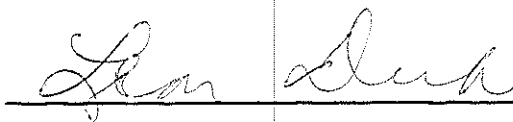


LEON DUKE, Attorney for Defendant

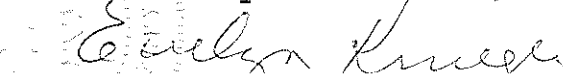
STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority in and for said State and County, this day personally appeared Leon Duke, attorney for the defendant, who being by me first duly sworn does depose and say that the answers to the foregoing interrogatories, if well and truly made, will be material evidence on the trial of this cause.

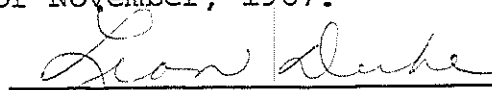


SUBSCRIBED and sworn to before me  
this 30th day of November, 1967.



NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

I certify that I served the foregoing interrogatories on the plaintiff's attorney, Hon. Harry J. Wilters, by mailing him a true copy on this 30th day of November, 1967.



LEON DUKE, Attorney for Defendant

**FILED**

1 1967

ALL 1. 1967

PACE HOLLAND COMPANY, a  
corporation,

Plaintiff,

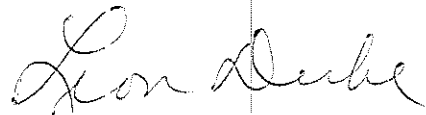
VS.

MRS. J. B. HOLLY,

Defendant.

: IN THE CIRCUIT COURT  
:  
OF BALDWIN COUNTY  
:  
ALABAMA  
:  
CIVIL DIVISION  
:  
:  
: CASE NO. 7806

Comes now the defendant in the above-styled cause  
and for answer to the complaint says that the note sued  
upon is barred by the statute of limitations of ten years.



LEON DUKE, Attorney for Defendant

I certify that I served the foregoing answer on  
the plaintiff's attorney by mailing him a true copy addressed  
to Hon. Harry J. Wilters, Bay Minette, on this 30th day of  
November, 1967.



LEON DUKE, Attorney for Defendant

FILED

DEC 1 1967

NOTED FOR FILING

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Mrs. J. B. Holly, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Pace Holland Company, a Corporation.

Witness my hand, this the 25 day of Oct., 1967.

Alice J. Duck  
Alice J. Duck, Clerk

PACE HOLLAND COMPANY, a  
Corporation,

Plaintiff,

vs.

MRS. J. B. HOLLY,

Defendant.

X  
X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA  
X AT LAW  
X CASE NO. 2806  
X  
1.

The Plaintiff claims of the Defendant the sum of THREE THOUSAND FIFTY-ONE AND 75/100 DOLLARS (\$3,051.75), due by a promissory note made by her on the 14th day of January, 1955, payable in monthly installments of \$100.00 each, with interest at the rate of six per cent (6%) per annum, which said note is now due and unpaid.

And the Plaintiff alleges that the Defendant in said note, and that as part of the consideration thereof, did as to this debt, place her rights of exemption as to the personal property granted under the Constitution and Laws of the State of Alabama, and agreed to pay a reasonable attorneys fee for the attorney for collection thereof, which the Plaintiff further

claims in the sum of THREE HUNDRED DOLLARS (\$300.00) together  
with the interest on both amounts.

WILTERS & BRANTLEY

BY: *Elmer Wilters*

Attorneys for the Plaintiff,

Defendants' address is:

Route 1

Pine Apple, Alabama

(Wilcox County)

007 25 1967

ALICE J. DICK CLERK  
REGISTER

Executed this 24th Day of November  
1967 by serving a copy of the within  
on Mr. G. B. Halley

E. A. Watson Sheriff

80 miles @ .10 per mile \$8.00

RECEIVED

OCT 25 1967

TAYLOR WILKINS  
CLERK

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 2806

PACE HOLLAND COMPANY, a  
Corporation,

Plaintiff,

vs.

MRS. J. B. HOLLY,

Defendant.

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY  
Attorneys at Law  
Bay Minette, Alabama