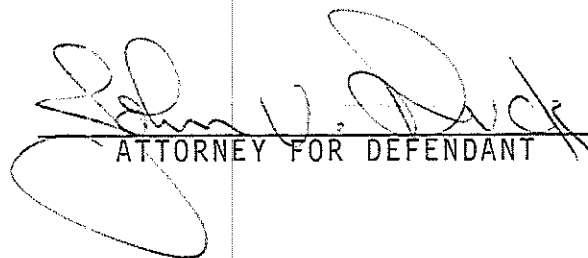


FIRST NATIONAL BANK OF BAY MINETTE,)	IN THE CIRCUIT COURT OF
A National Banking Association,	
Plaintiff,	BALDWIN COUNTY, ALABAMA
	AT LAW, CASE NO. 7809
vs.	
CHARLES N. ROLEY,	
Defendant.	

DEMURRER

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein and for grounds thereof says:

1. That said Bill of Complaint does not state a cause of action.
2. That the amount claimed by the Plaintiff is a mere conclusion of the pleader.


ATTORNEY FOR DEFENDANT

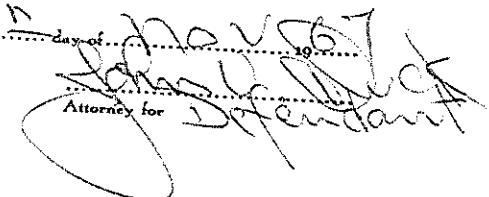
The Defendant respectfully demands
a Trial by Jury.



FILED
NOV 13 1967
CLERK
JAMES L. BROWN

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 10th day of May 1967

Attorney for Defendant

FIRST NATIONAL BANK OF BAY MINETTE,)	
A National Banking Association,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
CHARLES N. ROLEY,)	
Defendant.)	LAW SIDE.
)	

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY FOUR AND 07/100 DOLLARS (\$334.07), the balance due by Promissory Note executed by him on May 16, 1966, and payable in 12 monthly installments, commencing on June 25, 1966, with the interest thereon from December 25, 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 the 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, whereof the Plaintiff claims the benefit.

OWENS AND PATTON

By: *J. Owens, Jr.*

Attorneys for Plaintiff.

FILED

OCT 27 1967

ALICE J. BUCK CLERK
REGISTER

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 CHARLES N. ROLEY

..... CEDAR STREET

..... 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.....

..... Charles N. Roley Defendant.....

by First National Bank of Bay Minette, a national banking association,

..... Plaintiff.....

Witness my hand this..... 27 day of..... October 19..... 67.....

..... Clerk

22 Ek 10-21-67

144

No. 1889

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association

Plaintiffs

vs.

CHARLES N. ROLBY

Defendants

SUMMONS AND COMPLAINT

Filed OCTOBER 27 1967

W. S. Alexander
Clerk

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Cedar Street
Bay Minette, Alabama

RECEIVED

OCT 27 1967

TAYLOR WILKINS
SHERIFF Sheriff

I have executed this summons

this OCT 31 1967
by leaving a copy with

Charles N. Rolby

W. S. Alexander
Deputy Sheriff

15546