FIRST NATIONAL BANK OF BAY MINETTE, A NATIONAL BANKING ASSOCIATION,

PLAINTIFF

VS

HENRY PATRICK AND ISABELLA PATRICK,

DEFENDANTS

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW CASE NO: 8322

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COMES THE DEFENDANTS, HENRY PATRICK AND ISABELLA PATRICK, IN THE ABOVE STYLED CAUSE AND DEMURS TO THE PLAINTIFF'S COMPLAINT, AND TO EACH COUNT THEREOF, SEPARATELY AND SEVERALLY, AND ASSIGNS THE FOLLOWING GROUNDS OF DEMURRER:

- 1. No cause of Action is stated.
- FOR OUGHT THAT APPEARS NO DEMAND WAS MADE ON

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DEFENDANTS.

BAILEY & TAYLOR

BY: Thorn G. Jaylor LLOYD E. TAYLOR

ATTORNEYS FOR THE DEFENDANTS

FOR THE TRIAL IN THIS CAUSE

DEFENDANTS DEMAND A TRIAL BY JURY.

OCT 3 1968

ALGE J. DIGK CLERK REGISTER

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FIRST NATIONAL BANK OF BAY MINETTE, A NATIONAL BANKING ASSOCIATION,

PLAINTIFF

VS °

HENRY PATRICK AND ISABELLA PATRICK,

Defendants

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW CASE NO: 8322

OCT 3 1968

CLERK REGISTER

FIRST NATIONAL BANK OF BAY MINETTE, A National Banking Association,		IN THE CIRCUIT	COURT OF
Plaintiff,			
		BALDWIN COUNTY,	ALABAMA
vs.	,		
HENRY PATRICK and ISABE	LLA PATRICK.	LAW SI	DE.
	)		
Defen	dants.		

The Plaintiff claims of the Defendants the sum of FIFTEEN HUNDRED SIXTY EIGHT AND 63/100 DOLLARS (\$1568.63), the balance due by Promissory Note made by them on March 1, 1968, payable in 24 monthly installments of \$74.00 each, commencing on the 10th day of April, 1968, with interest thereon at the rate of eight percent (8%) per annum, from May 10, 1968, the date of default by said Defendants; 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 Defendants defaulted in their obligation to pay the installments as set forth.

Plaintiff further alleges that in and by the terms of said note, the Defendants waived all rights of homestead under the Laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note the Defendants agreed to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the further reasonable attorney's fee in the premises.

OWENS AND PATTON

Attorneys for Plaintiff.

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FIRST NATIONAL BAN				
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## STATE OF ALABAMA

Baldwin County

## CIRCUIT COURT

FIRST NATIONAL BANK OF BAY MINETTE, a National Banking Association

Plaintiffs

vs.

HENRY PATRICK and ISABELLA

Defendants

## SUMMONS AND COMPLAINT

iled SEPTEMBER 17 19 68

Were Live & Clerk

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Shombu Stor.

Defendant lives at ROUTE I BOX 268	
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