

S. W. JACOBS,)
PLAINTIFF) IN THE CIRCUIT COURT OF
VS) BALDWIN COUNTY, ALABAMA
DAVID PATRICK,) AT LAW
DEFENDANT) CASE NO: 8326

D E M U R R E R

COMES THE DEFENDANT, DAVID 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.
2. FOR OUGHT THAT APPEARS NO DEMAND WAS MADE ON
DEFENDANT.

BAILEY & TAYLOR
BY: Lloyd E. Taylor
LLOYD E. TAYLOR
ATTORNEYS FOR THE DEFENDANT

FOR THE TRIAL OF THIS CAUSE
DEFENDANT DEMANDS A TRIAL BY JURY.

Lloyd E. Taylor

FILED

OCT 3 1968

ALICE J. DUCK CLERK
REGISTER

8326

July

S. W. JACOBS,

PLAINTIFF

VS

DAVID PATRICK,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO: 8326

FILED

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S. W. JACOBS,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
DAVID PATRICK,)	
)	LAW SIDE.
Defendant.)	

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY AND 85/100 DOLLARS (\$320.85) due by Promissory Note made by the Defendant to the First National Bank of Bay Minette, A National Banking Association, said note being dated May 6, 1966, and being in the principal sum of \$1285.85, and payable in 23 installments of \$66.00 each with one final installment of \$5.00, which said note was endorsed by the Plaintiff herein, the same npt being paid at maturity, and which said note was assigned to the Plaintiff herein on September 12, 1968, which said balance, with the interest thereon, is due and unpaid.

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 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, and Plaintiff claims the benefit of such attorney's fee in the premises.

OWENS AND PATTON

By:

[Signature]
Attorneys for Plaintiff.

FILED

SEP 19 1968

ALICE J. DUCK

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 DAVID PATRICK
..... ROUTE I, BOX 262
..... DAPHNE, 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.....

DAVID PATRICK

..... Defendant.....

by S. W. JACOBS

..... Plaintiff.....

Witness my hand this..... ^{19th}~~10th~~..... day of..... September..... 19.68.

..... *Alice J. Luck* Clerk

No. 8326

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

S. W. JACOBS

Plaintiffs

vs.

DAVID PATRICK

Defendants

SUMMONS AND COMPLAINT

Filed SEP 19 1968 19 68

FILED

Clerk

SEP 19 1968

ALICE J. DUCK

CLERK
REGISTER

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route I, Box 262
Daphne, Alabama

Received In Office

RECEIVED

19.....

SEP 19 1968

Sheriff

I have executed this summons

this Sept 20 19 68

by leaving a copy with

*David Patrick
Daphne*

Sheriff claims 54 miles at

Ten Cents per mile Total \$4.10

TAYLOR WILKINS, Sheriff

BY *Roy Randall*
DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Roy Randall

Deputy Sheriff