

STATE OF ALABAMA

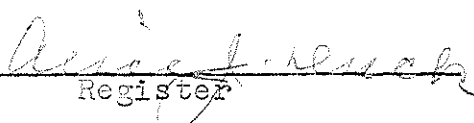
BOOK 021 PAGE 389

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summons W. L. Spence, to appear and plead, answer or demur within thirty days of the service hereof, to the bill of complaint, filed in the Circuit Court of Baldwin County, Alabama, in Equity, by First National Bank of Bay Minette, a corporation, as Complaint and against W. L. Spence as Respondent.

WITNESS my hand this the 31 day of Aug 1955.


Register

FIRST NATIONAL BANK OF
BAY MINETTE, a corporation

COMPLAINANT

VS.

W. L. SPENCE,

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. _____

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021
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TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, SITTING IN EQUITY:

Your Complainant, the First National Bank of Bay Minette,
a corporation, respectfully represents and shows unto Your Honor
and this Honorable Court as follows:

I

That your Complainant is a corporation organized pursuant to
the National Banking Act with its principal place of business at
Bay Minette, Alabama; that the Respondent is over the age of 21
years and is a bonafide resident of Baldwin County, Alabama.

II

That on May 9, 1955, the Respondent executed a certain
promissory waive note in the sum of \$429.00 at the rate of
8% per annum, payable to the Complainant on or before May
23, 1955; that a copy of said note is attached hereto and
labeled Exhibit "A" and made a part of this complaint as if
the same had been written herein. That by the terms of said
note the Respondent did grant, bargain, sell, and convey,
unto the Complainant the following described personal property
situated in Baldwin County, Alabama, to-wit:

All of my live stock, farming implements; and all
my household and kitchen furniture and all other
personal property of every description now owned
by me or which I or either of us may acquire before
payment in full of this obligation.

1951 Ford Fordor Sedan-Motor Number B1MF-114766-Deluxe

PRAYER FOR PROCESS

WHEREOF, the premises considered, your Complainant prays that this Honorable Court will by proper process make the said W. L. Spence, party Respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalty prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Your Complainant further prays that upon the hearing hereof, Your Honor will enter an order and decree ascertaining the amount of the principal indebtedness of the Respondent to the Complainant and the interest thereon; that Your Honor will enter a decree and order foreclosing the mortgage and directing a sale of the personal property covered by the said mortgage; further that this Honorable Court will enter an order providing for a reasonable attorney's fee in the premises and should the proceeds of the sale of the personal property of the Respondent be insufficient to cover the whole amount of the indebtedness, that this Honorable Court enter an order providing for the payment of said deficiency. Your Complainant further prays for such other, different and general relief as your Complainant may be in equity and good conscience entitled to receive.


SOLICITOR FOR COMPLAINANT

BOOK 021 PAGE 401

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

First National Bank of Bay Minette
 Complainant,
 Vs. W. L. Spence
 Respondent.

In the Circuit Court.
 In Equity No. 3791.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____
W. S. Spence

by the Sheriff of Baldwin County, on the 2 day of Sept,
194 55.

And it further appears to the Register, that that the said _____
W. L. Spence

_____ the Respondent, having to the date hereof,
 failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
 on motion of J. Connor Owens, Jr. Solicitors
 for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
 and it hereby is, in all things taken as confessed against the said W. L. Spence

This 13 day of July, 194 56.

 Register.

No. _____

**CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY**

Complainant,

Vs.

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this _____ day of _____

194_____.

Register.

THE STATE OF ALABAMA, }
Baldwin County

No. 3791 Circuit Court, In Equity.

First National Bank of Bay Minette

Complainant...

Vs.

W. L. Spence

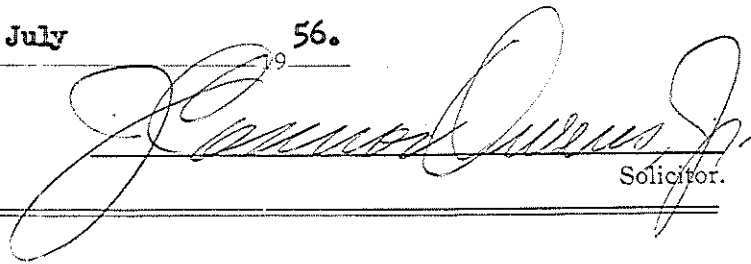
Defendant....

Motion is hereby made for a Decree Pro Confesso against W. L. Spence

Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant ... ha failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 13 day of July 19 56.



Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

Vs.

Motion for Decree Pro Confesso on
Personal Service

Filed 7-13 19 56

W. J. Duck
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.