

LYONS FINANCE SERVICE,)
INCORPORATED, a corporation,)
of Pennsylvania,)

Plaintiff,)

vs.)

KENNETH FRANCHE and HELENA)
S. FRANCHE, individually and)
jointly, as to each,)

Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1831

Now comes Lee.E. Higgins as attorney for the defendants
and files herewith his appearance in the above entitled cause
and reserves the right to demur or plead specially.

The defendant demands that the above entitled cause be
tried by jury.

Lee E. Higgins
Attorney for defendant

Service of a copy of the
foregoing appearance etc.,
is hereby acknowledge on
this // day of August 1952,
and further service dispensed
with.

Harold A. Davis
Atty for Plaintiff

RECORDED

FILED

AUG 12 1962

ALICE J. DUCK, Clerk

LYONS FINANCE SERVICE,
INCORPORATED, a corporation,
of Pennsylvania,

Plaintiff,

vs.

KENNETH FRANCHE and HELENA
S. FRANCHE, individually and
jointly, as to each,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. _____

COUNT ONE

Plaintiff claims of the Defendants the sum of TWO HUNDRED TWENTY NINE AND 01/100 (\$229.01) DOLLARS due from them by promissory note made by the Defendants on the 19th day of April, 1951, and due and payable by monthly installments of \$24.59, beginning on the 19th day of May, 1941, and on the 19th day of each consecutive month thereafter. Plaintiff avers that default was made on the 19th day of October, 1951, which sum of money, with interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of said note, Defendants waived all rights to personal property exemptions to which they are entitled under the Constitution and laws of the State of Alabama, and that they agreed to pay a reasonable attorney's fee for the collection of this note, which Plaintiff claims, in addition thereto, in the sum of \$45.80.

REYNOLDS AND DOWNING

Raymond A. Downing
Attorneys for Plaintiff

Defendants' Address:

6 Fairhope Avenue
Fairhope, Alabama

FILED
JUL 15 1952
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1831

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Kenneth Franche and Helena Franche

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
Kenneth Franche and Helena Franche, Defendant.

by

Lyons Finance Service, Incorporated, a corporation of Pennsylvania, Plaintiff.

Witness my hand this 15th day of July 19 52

W. J. Luck, Clerk

6-7
No. 1831

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RECORDED
26 Aug

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LYONS FINANCE SERVICE, INCORPORATED

a corporation of Pennsylvania

Plaintiffs

vs.

KENNETH FRANCHE and HELENA FRANCHE

Defendants

SUMMONS and COMPLAINT

Filed 7-15-52, 19

Alice J. French, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

July 15, 1952
Taylor Wilburn, Sheriff

I have executed this summons

this July 30, 1952
by leaving a copy with

Kenneth Franche
and
Helena Franche

Taylor Wilburn, Sheriff
James Horn, Deputy Sheriff

HIGGINS & HIGGINS

ATTORNEYS AT LAW

421-425 GREYSTONE BUILDING

104 ST. JOSEPH STREET

MOBILE, ALABAMA

JOHN R. HIGGINS
LEE E. HIGGINS

October 3rd, 1952

Alice J. Duck
Circuit Clerk,
Baldwin County,
Bay Minette, Alabama.

Re: Lyons Finance Service, Inc.
a corporation of Pennsylvania
Vs: Kenneth Franche and Helena
Franche
No: 1831

Dear Madam:

Please withdraw my appearance as attorney in
the above styled cause. I have notified the defendant
of my withdrawal and presumably he consulted a Baldwin
County lawyer.

Very truly yours,

Lee E. Higgins
Lee E. Higgins

LEH/ek

FILED

OCT 4 1952

ALICE J. DUCK, Clerk

J. TERRY REYNOLDS, JR.

ATTORNEY AT LAW

907-909 FIRST NATIONAL BANK BLDG.

MOBILE 13, ALABAMA

ASSOCIATE:
MAURICE A. DOWNING

July 14, 1952

TELEPHONE 3-3661

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama

Re: Lyone Finance Service, Inc.
Vs: Kenneth & Helena Franche

Dear Sir:

Will you please file the enclosed complaint for me and inform me if and when service is had on the above named people. The Sheriff of Baldwin County served these people for us about a month ago in the same cause, but they filed a plea claiming that they were residents of Baldwin County, which the Court held to be good under the circumstances.

Thank you very much.

Very truly yours,

REYNOLDS AND DOWNING


Maurice A. Downing

MAD:mkg

1831

Lyons Finance Service
Inc.
a corp of Pennsylvania
PA.

Kenneth Francke
Helena Francke

Promissory Note

FILED

JUL 15 1952

ALICE L. DUEK, Clerk

1831

Reynolds & Leavins