

THE CITIZENS AND PEOPLES  
NATIONAL BANK OF PENSACOLA,  
FLORIDA, a national banking  
institution,

Plaintiff,

vs.

JAMES E. PRYOR,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

9154

The Plaintiff claims of the Defendant the sum of Six Hundred Dollars (\$600.00) due by Promissory Note made by him on the 6th day of October, 1969 and payable on the 7th day of January, 1970, with interest thereon.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure said note, including a reasonable attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Ninety Dollars (\$90.00) as such reasonable attorneys' fee.

The Plaintiff further avers that in, by and as a part of said note the defendant waives as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to personal property, and the Plaintiff claims the benefit of such waiver.

CHASON, STONE & CHASON

By:

*John E. Chason*  
Attorneys for Plaintiff

Defendant may be served in  
Fairhope, Alabama.

**FILED**

MAR 3 1970

**ALICE J. DUCK**

CLERK  
REGISTER

VOL

64 PAGE 561

FILED

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BANK OF PENSACOLA, FLORIDA, a  
national banking institution,

Plaintiff,

vs.

JAMES E. PRYOR,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

Complaint

\* \* \* \* \*

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9154

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James E. Pryor

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.....

James E. Pryor ... Defendant.....

by The Citizens and Peoples National Bank of Pensacola, Florida, a National  
banking institution ..... Plaintiff.....

Witness my hand this..... 3rd ..... day of March ..... 1970 .....

Alice J. Duck Clerk

43-9-70

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

THE CITIZENS AND PEOPLES NATIONAL BANK

OF PENSACOLA, FLORIDA A National Banking  
Institution  
Plaintiffs

vs.

JAMES E. PRYOR

Point Clear, Ala Defendants

**SUMMONS AND COMPLAINT**

928-5381

Filed March 3, 1970

Alice J. Duck Clerk

Chason, Stone & Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 3, 1970

Sheriff

I have executed this summons

this 9 March 1970  
by leaving a copy with

James E. Pryor

Sheriff claims \$800.00  
Ten Cents per mile Total \$ 800  
TAYLOR WILKINS, Sheriff  
BY CROOK  
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Point Clear, Ala