

STEELE INVESTMENT COMPANY, INC. Ø
A CORPORATION

PLAINTIFF Ø

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

VS.

AT LAW

WILMER PICKENS AND LILLY MAE Ø

PICKENS,

DEFENDANTS Ø

CASE NO: 9207

M O T I O N

COMES NOW THE DEFENDANT, WILMER PICKENS, INDIVIDUALLY,
BY AND THROUGH HIS ATTORNEYS OF RECORD AND WITHDRAWS HIS DEMAND
FOR A TRIAL BY JURY.

BAILEY & TAYLOR

BY: Shoy E. Taylor
ATTORNEYS FOR DEFENDANT

FILED

APR 13 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

STEELE INVESTMENT CO., INC.
A CORPORATION,

PLAINTIFF,

VS

WILMER PICKENS AND LILLY MAE
PICKENS,

DEFENDANTS,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO: 9207

D E M U R R E R

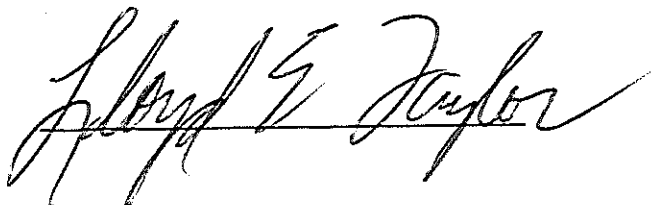
COMES THE DEFENDANT, WILMER PICKENS, INDIVIDUALLY, IN THE
ABOVE STYLED CAUSE AND DEMURS TO THE PLAINTIFF'S COMPLAINT, AND
TO EACH COUNT THEREOF SEPARATELY AND SEVERALLY, AND ASSIGNS THE
FOLLOWING GROUNDS OF DEMURRER:

1. IT DOES NOT APPEAR THEREFROM THAT THERE WAS ANY CONSIDER-
ATION FOR DEFENDANT'S ALLEGED PROMISE.
2. SAID COUNT IS VAGUE AND INDEFINITE.
3. IT DOES NOT APPEAR THEREFROM WHAT AMOUNT WAS DUE WITH
REGARD TO THE INTEREST ON THE ALLEGED PROMISSORY NOTE.

BAILEY & TAYLOR

By: 
ATTORNEYS FOR THE DEFENDANT

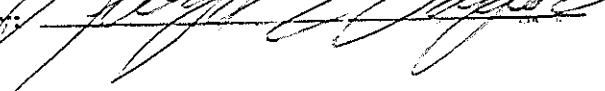
FOR A TRIAL IN THIS CAUSE THE
DEFENDANT DEMANDS A TRIAL BY JURY.



CERTIFICATE OF SERVICE

I do hereby certify that I have on this 5/7/70
served a copy of the foregoing on JOSEPH OWENS, JR.
By mailing the same by United States Mail, Properly addressed, and First
Class Postage Prepaid.

BAILEY & TAYLOR

By: 

FILED

MAY 7 1970

ALICE J. DUCK CLERK
REGISTER

July

94.07

FILED

MAY 7 1970

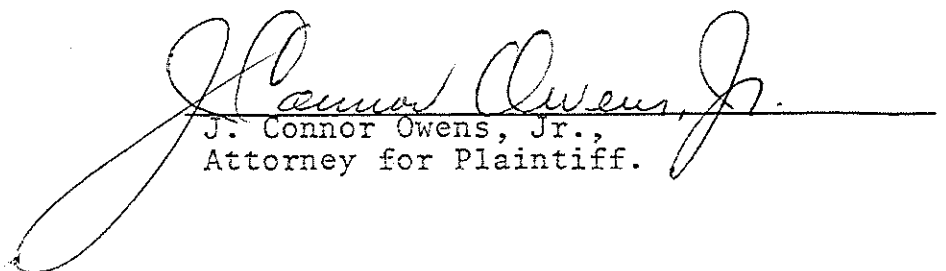
ALICE J. DUCK CLERK
REGISTER

STEELE INVESTMENT CO., INC.,)	
A Corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
WILMER PICKENS and LILLY MAE)	AT LAW. 9207
PICKENS,)	
)	
Defendants.)	

The Plaintiff claims of the Defendants the sum of ONE THOUSAND SIX HUNDRED FORTY AND 18/100 DOLLARS (\$1,640.18), the balance due by Promissory Note made by the Defendants on December 19, 1966, and payable in installments, commencing on February 1, 1967, with interest thereon from August 1, 1968; 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 out hereinabove.

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 and additional reasonable attorney's fee in the premises.


 J. Connor Owens, Jr.,
 Attorney for Plaintiff.

FILED

APR 10 1970

ALICE J. DUCK

CLERK
REGISTER

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SUMMONS AND COMPLAINT

THE 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 SummonWILMER PICKENS and.....

.....LILLY MAE PICKENS.....

.....FOLEY, 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.....

Wilmer Pickens and Lilly Mae Pickens
..... Defendant.....

by STEELE INVESTMENT CO., INC., a corporation
.....

..... Plaintiff.....

Witness my hand this.....10th.....day of.....April..... 19.....70

FILED

Alice J. Duck
Clerk

APR 10 1970

April 16-70

VOL

66

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No. 92 07

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THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

STEELE INVESTMENT CO., INC.,
A Corporation,

Plaintiffs

vs.

WILMER PICKENS and LILLY MAE
PICKENS Defendants

SUMMONS AND COMPLAINT

Filed April 10 1970

Clerk

FILED

APR 10 1970

ALICE J. DUCK

CLERK
REGISTER

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

FOLEY, ALABAMA

Received In Office

April 10 1970

Taylor Wilkins Sheriff

I have executed this summons

this 16th April 1970

by leaving a copy with

Wilmer Pickens
Lilly Mae Pickens

Sheriff claims 14 1/2 miles at

Ten Cents per mile Total \$ 14 40

TAYLOR WILKINS, Sheriff

BY Deputy Sheriff DEPUTY SHERIFF

Taylor Wilkins Sheriff

Deputy Sheriff Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

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