

STATE BANK OF ELBERTA)
)
PLAINTIFF) IN THE CIRCUIT COURT OF
)
-vs-) BALDWIN COUNTY, ALABAMA
)
B. L. POLK) AT LAW
)
DEFENDANT) NO. 2814

Comes the defendant in the above entitled cause and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurrer, assigns, separately and severally the following:

1. It si not alleged with sufficient surety as to who made the prommissory note.
2. It is not alleged what rate of interest is due on said note.
- 3/ It is not alleged when the time begins for the interest to start.
4. For aught that appears from the bill of complaint, the note carries a usurious rate of interest.
5. For aught that appears the note has been paid.
6. For aught that appears from the complaint there was no consideration for the note.
7. The complaint does not state a cause of action.

Arthur C Epperson
Attorney for the Defendant

THE DEFENDANT DEMANDS A TRIAL BY JURY.

Arthur C Epperson

SUMMONS

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon B. L. POLK, 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, Alabama, at Bay Minette, against B. L. POLK, by the STATE BANK OF ELBERTA.

Witness my hand this 5th day of January, 1956.

Albert Shuck
Clerk

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COMPLAINT

STATE BANK OF ELBERTA,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

B. L. POLK,

BALDWIN COUNTY, ALABAMA

DEFENDANT

AT LAW

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00), due by promissory note made by him on the 30th day of October, 1953, and payable on the 30th day of January, 1954, with interest thereon.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED FIFTY & 00/100 DOLLARS (\$150.00), due by promissory note made by him on the 20th day of January, 1954, and payable on the 20th day of April, 1954, with interest thereon.

Said notes are waive notes and provide for a reasonable attorney's fee, which plaintiff alleges to be \$80.00.

Bullock Law Firm
Attorney for Plaintiff

The defendant lives near Foley, Alabama.