

STATE BANK OF ELBERTA)
)
 PLAINTIFF)
)
 -vs-)
)
 B. L. POLK)
)
 DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
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 is not alleged with sufficient surety as to who made the promissory 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.


Attorney for the Defendant

THE DEFENDANT DEMANDS A
TRIAL BY JURY.



THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

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.

Robert. Duck
Clerk

Attorney for Plaintiff

The defendant lives near Foley, Alabama.