

S U M M O N S

THE STATE OF ALABAMA	)	*	(	IN THE CIRCUIT COURT OF
	:	*	:	BALDWIN COUNTY, ALABAMA
COUNTY OF BALDWIN	)	*	(	AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - - - GREETING:

You are hereby commanded to summons E.L. Pace to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of H. Kennedy.

Witness my hand this 16 day of May, 1958.

  
CLERK

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C O M P L A I N T

H. KENNEDY  
PLAINTIFF  
  
VS.  
  
E. L. PACE  
DEFENDANT

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3549

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

I.

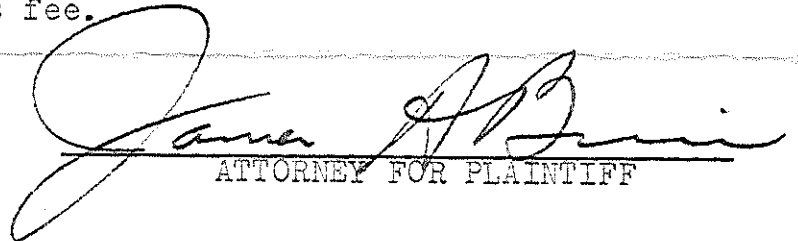
The plaintiff claims of the defendant the sum of One Hundred Nine & 88/100 (\$109.88) Dollars, due by promissory note made by the defendant on the 3rd day of October, 1953, and payable on the 1st day of November, 1953, with interest from the 1st day of November, 1953, at the rate of Six (6%) per cent. per annum.

II.

The plaintiff claims of the defendant the sum of One Hundred Nine & 88/100 (\$109.88) Dollars, due by promissory note made by the defendant on the 3rd day of October, 1953, and payable on the 1st day of November, 1953, with interest from the 1st day of November, 1953, at the rate of Six (6%) per cent. per annum.

Plaintiff avers that in and by the terms of said note the defendant waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms 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 attorney's fee, and the plaintiff further claims of the defendant the further and additional sum of Twenty-five & NO/100 (\$25.00) Dollars as such reasonable attorney's fee.

  
ATTORNEY FOR PLAINTIFF

THE defendant, E.L. Pace,  
resides at Silver hill, Alabama

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

August 27, 1958

WHITEHALL 3-3601

Mrs. Alcie J. Duck  
Circuit Clerk  
Bay Minette, Alabama

Dear Mrs. Duck:

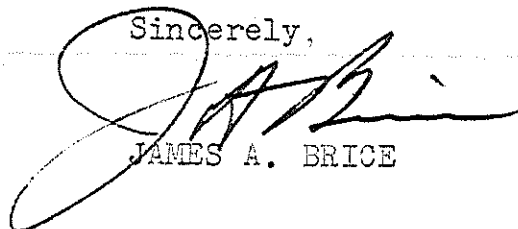
Re: H. Kennedy vs. E.L. Pace  
Law 3549

I enclose the promissory note signed by the defendant in the above styled cause.

Please take judgment by default for \$109.88 principal, \$31.86 interest and \$25.00 attorney's fee, a total of \$166.74. Please send me a certified copy of the judgment.

Thank you.

Sincerely,



JAMES A. BRICE

JAB:bp

Enclosure as noted.