

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU are hereby commanded to summon AMELIA T. JENKINS and JOHN W. JENKINS to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of PACE-HOLLAND COMPANY, a corporation.

WITNESS my hand, this 28 day of Feb, 1959,

Deice J. Amels
Clerk

PACE-HOLLAND COMPANY,
A CORPORATION,

PLAINTIFF

VS

AMELIA T. JENKINS AND
JOHN W. JENKINS

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

1.

The Plaintiff claims of the Defendants the sum of FIVE HUNDRED TWENTY TWO DOLLARS and 98/100 (\$522.98), the balance due on promissory note made by the Defendants on, to-wit, the 29th day of June, 1955, and payable in monthly installments of Fifty (\$50.00) Dollars each until the full amount of the principal and interest has been paid, the first of which payments shall be payable on the 29th day of July, 1955, Upon non-payment of any installment at its maturity, all remaining installments shall become due and payable forthwith.

And the Plaintiff alleges that the Defendants in said note and as part of the consideration thereof did as to this debt waive their rights of exemption as to personal property granted under the Constitution of the laws of the State of Alabama, and agreed to pay a reasonable attorneys fee for the collection thereof, which the Plaintiff further claims in the sum of ONE HUNDRED (\$100.00) DOLLARS, together with the interest on both amounts.

Executed March 14, 1959

Wilters & Brantley

BY: Edward Wilters, Jr.

Attorneys for the Plaintiff

3779

Received 28 day of Feb 1959
on 16 day of March 1959
served a copy of the within 8 & C
Amelia T. Jenkins
John W. Jenkins
service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Stephens

Lopley, Ala

Sheriff claims 80 miles at
Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS, Sheriff
BY Madham
DEPUTY SHERIFF

PAGE-HOLLAND COMPANY,
a corporation,

PLAINTIFF

VS

AMELIA T. JENKINS AND
JOHN W. JENKINS

DEFENDANTS

BILL OF COMPLAINT

FILED

FEB 28 1959

ALICE J. DUCK, CLERK
REGISTER