

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

September 4, 1959

WHITEHALL 3-3601

3917

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

Re: Peoples Fertilizer Company
vs. Ira N. Eslava

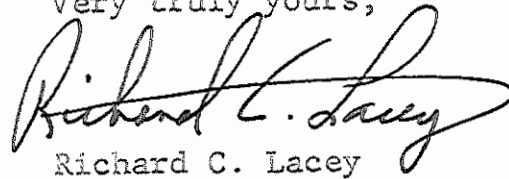
Dear Mrs. Duck:

Please find enclosed the foundation note in the above case. Please place before Judge Hall for judgment for Plaintiff by default for \$338.91 principal, \$22.05 interest and \$50.00 attorney's fee, a total of \$410.94.

Please send certified copy of the judgment.

Thank you.

Very truly yours,


Richard C. Lacey

RCL/vd

Enclosure

SUMMONS

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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

You are hereby commanded to summons Ira N. Eslava to appear before 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 Peoples Fertilizer Company, a corporation.

Witness my hand this 27 day of July, 1959.

E-8-3-59

Reine J. [Signature]
CLERK

COMPLAINT

PEOPLES FERTILIZER COMPANY,)
a corporation,)

PLAINTIFF)

VS)

IRA N. ESLAVA,)

DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I.

The plaintiff claims of the defendant the sum of Three Hundred Thirty Eight Dollars and Ninety One Cents (\$338.91) principal, due by promissory note made by said defendant on the 26th day of August, 1958, and payable on the 1st day of December, 1958, with interest from the 5th day of August, 1958, at the rate of 6 per cent per annum.

II.

The plaintiff claims of the defendant the sum of Three Hundred Thirty Eight Dollars and Ninety One Cents (\$338.91) principal, due by promissory note made by said defendant on the 26th day of August, 1958 and payable on the 1st day of December, 1958, with interest from the 5th day of August, 1958, at the rate of 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 attorneys fee, and plaintiff further claims of the defendant the further and additional sum of \$50.00 as such reasonable attorney's fee.

James A. Brice
JAMES A. BRICE
Richard C. Lacey
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

70.3917 ✓

SUMMONS

IRA N. ESLAVA

COMPLAINT

PEOPLES FERTILIZER COMPANY,

a corporation

VS

IRA N. ESLAVA

PAID

JUL 27 1959

ALICE J. DUCK, CLERK

LAW OFFICES OF
JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA

Received 27 day of July 1959
and on 3 day of Aug 1959
I served a copy of the within P. O. C.
on Ira N. Eslava

By service on _____

TAYLOR WILKINS, Sheriff
By Carlisle B. Davis, S.

Magnolia Springs

Sheriff claims 84 miles at
Ten Cents per mile Total \$ 8.40
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF