

LAW OFFICES OF  
J. TERRY REYNOLDS, JR.  
AND  
WILLIAM R. LAUTEN  
ATTORNEYS AT LAW  
605-6 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA

HEMLOCK 3-3661

March 7, 1962

5070

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

Re: J. Terry Reynolds, Jr.-Plaintiff vs: Mary Y. Grice  
and Charles D. Grice, individually and jointly-Defendants  
Circuit Court, Bay Minette, Alabama

Dear Mrs. Duck:

It will be most sincerely appreciated if you will file the enclosed suit for me as Attorney for Mr. Reynolds and if you will tell Sheriff Wilkins that I do not have a better address for the Defendants. I feel sure that Sheriff Wilkins will know where to locate Mr. Charlie Grice and Mary Grice. It may be that Mary is back teaching school in Tuscaloosa at the University and if she is please ask Sheriff Wilkins to forward a copy of this suit with summons to the Sheriff in Tuscaloosa to be served upon her. Please let me know as soon as possible if both Defendants were served,

Warmest personal regards,

*William R. Lauten*  
WILLIAM R. LAUTEN

WRL:jp  
Dictated but not checked

P.S. Mrs. Duck: I am enclosing a copy of this letter so that you may give it to the Sheriff for instructions.

J. TERRY REYNOLDS, JR.,

Plaintiff,

VS:

MARY Y. GRICE and  
CHARLES D. GRICE, individually  
and jointly,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW,

CASE NO. 5070

COUNT ONE

The Plaintiff claims of the Defendants the sum of ONE THOUSAND THREE HUNDRED SIXTY-THREE AND 23/100 (\$1,363.23) DOLLARS, due from them by promissory note made by the Defendants on the 24th day of September, 1957, due and payable in monthly installments of SIXTY-FIVE AND NO/100 (\$65.00) DOLLARS each, the first of said installment payments being due and payable on the 1st day of January, 1958, and a like installment payment being due and payable on the 1st day of each consecutive month thereafter until paid in full. Plaintiff avers that default was made on the 1st day of October, 1958, which sum of money, with interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of said note, the Defendants waived all rights to personal exemptions to which they are entitled under the Constitution and Laws of the State of Alabama, and that they agreed to pay a reasonable attorney's fee for the collection of this note, which Plaintiff claims, in addition thereto, in the sum of \$454.41.

William R. Lauten  
Attorney for Plaintiff

Defendants' Address:

Route 1  
Bay Minette, Alabama

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on 13 day of April 1962  
I served a copy of the within De C  
on Charles D. Grice

LAW OFFICES  
J. Terry Reynolds, Jr.  
AND  
William R. Lauten  
1ST NAT'L BANK BLDG.  
MOBILE, ALA.

Sheriff claims 30 miles at \_\_\_\_\_  
Cents per mile Total \$ 3.00  
TAYLOR WILKINS, Sheriff  
Talbert  
DEPUTY SHERIFF

By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By W. A. Talbert D. S.  
Bromley

231

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5070

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MARY Y. GRICE and CHARLES D. GRICE

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, State of Alabama, at Bay Minette, against MARY Y. GRICE and CHARLES D. GRICE, Defendant.

by J. TERRY REYNOLDS, JR

Witness my hand this 8th day of March 1962

Archie J. Buck, Clerk

*Chambers* 3181  
No. 5070 Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

J. TERRY REYNOLDS, Jr.,

Plaintiffs

*23/Chambers* vs.

MARY Y. GRICE and CHARLES D. GRICE

Defendants

SUMMONS and COMPLAINT

Filed 3-8-1962

Alice J. Duck, Clerk

RECEIVED

APR 19 1962

SHERIFF'S OFFICE

Wm. Lauten

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3/8, 1962

Sheriff

I have executed this summons

this May 23, 1962

by leaving a copy with

*Mary Y. Grice*

*Rae L. Bridges* Sheriff  
*L. Chambers* Deputy Sheriff

J. TERRY REYNOLDS, JR.,	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
MARY Y. GRICE and	X	AT LAW	NO. <u>5020</u>
CHARLES D. GRICE, individually	X		
and jointly,	X		
Defendants	X		

Comes C. LeNoir Thompson, attorney for Charles D. Grice, defendant, in the above styled cause and demurs to said complaint filed in said cause and to each phase thereof separately and severally as follows:

-1-

That said complaint fails to state a cause of action.

-2-

That said complaint fails to allege the original amount due.

-3-

That said complaint fails to allege the amount paid on said alleged note.

-4-

That said complaint fails to allege a consideration for said alleged note.

THOMPSON & WHITE

BY: Mary Thompson White  
Attorneys for defendant, Charles  
D. Grice

FILED

APR 11 1962

ALICE J. DUCK, CLERK  
REGISTER

J. TERRY REYNOLDS, JR.,	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
MARY Y. GRICE and	X	AT LAW	NO. <u>5070</u>
CHARLES D. GRICE, individually	X		
and jointly,	X		
Defendants	X		

Comes C. LeNoir Thompson, attorney for Mary Y. Grice,  
defendant, in the above styled cause and demurs to said complaint  
filed in said cause and to each phase thereof separately and several-  
ly as follows:

-1-

That said complaint fails to state a cause of action.

-2-

That said complaint fails to allege the original amount due.

-3-

That said complaint fails to allege the amount paid on  
said alleged note.

-4-

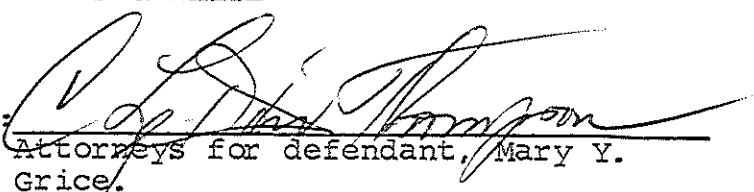
That said complaint fails to allege a consideration for  
said alleged note.

-5-

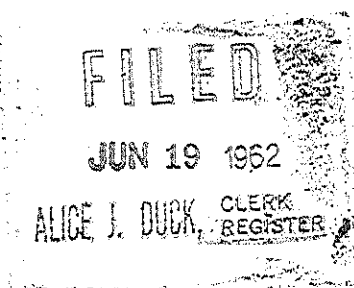
That said complaint fails to allege that defendant is in  
arrears on any payment.

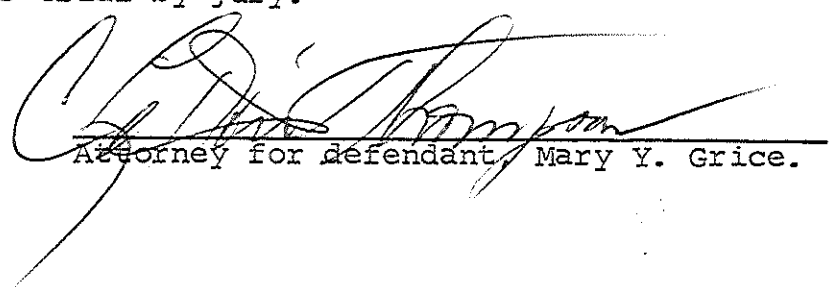
THOMPSON & WHITE

BY:

  
Attorneys for defendant, Mary Y. Grice.

Defendant requests trial by jury.



  
Attorney for defendant, Mary Y. Grice.