

STATE BANK OF ELBERTA,
PLAINTIFF

VS

MRS. H. RUMMEL,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5713

WITHDRAWAL OF APPEARANCE

Comes now James A. Brice, attorney of record for the plaintiff, and for good and sufficient reasons, with leave first had and obtained, withdraws his appearance as such, at the same time specifically reserving and claiming his lien against any sums collected for his attorney's fee for legal services rendered, as provided in the promissory note which is the basis of this suit.


James A. Brice

cc: Kenneth Cooper, Attorney

cc: State Bank of Elberta

FILED

12-8-44

ALICE L. DICK, CLERK
REGISTER

STATE BANK OF ELBERTA, a State Banking Corporation)	IN THE CIRCUIT COURT OF
PLAINTIFF)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW, NO. 5713
MRS. H. RUMMEL)	
DEFENDANT)	

DEMURRER

Comes now the Defendant, Mrs H. Rummel, and files this her demurrer to the Complaint hereto filed in this cause, and to each and every count thereof, separately and severally; to-wit:

1. The Complaint does not state a cause of action.
2. The Complaint does not contain a copy of the promissory note allegedly due and payable.
3. The Complaint does not allege if the amount claimed due is the original amount of the note allegedly due or if it contains the amount still due on said note.
4. The Complaint is a mere conclusion of the pleader.

Kenneth Cooper
Kenneth Cooper
Attorney For Defendant

Attorney of Record
For Plaintiff is:
Hon Forest A. Christian
Attorney At Law
Foley, Alabama

FILED

OCT 22 1935

ALICE J. DUCK, CLERK
REGISTER

STATE BANK OF ELBERTA, a State
Banking Corporation

PLAINTIFF

VS

MRS. H. RUMMEL

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5713

COMPLAINT

The Plaintiff claims of the Defendant the sum of One Thousand Fifty-six and 40/100 Dollars (\$1,056.40), due by promissory note made by the Defendant on the 2nd day of February 1963, and payable on the 1st day of July 1963, with interest from February 2, 1963, at the rate of eight per cent (8%) 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 the waiver Plaintiff now claims benefits.

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 Two Hundred Dollars (\$200.00) as such reasonable attorney's fee


Attorney for Plaintiff

FILED

SEP 19 1963

ALICE J. DUCK, CLERK
REGISTRAR

22

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No.

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Mrs. H. Rummel

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

..... Mrs. H. Rummel, Defendant.....

by State Bank of Elberta, a State Banking Corporation

....., Plaintiff.....

Witness my hand this 19 day of Sept 1963

EX-9-20-63

Clara J. Alcock, Clerk

STATE of ALABAMA
Baldwin County
CIRCUIT COURT

State Bank of Elberta, a
State Banking Corporation
Plaintiffs

vs.

Mrs. H. Rummel
Defendants

Summons and Complaint

Filed _____ 19____

FILED

SEP 19 1963

Clerk
ALICE J. DUCK, CLERK REGISTER

James A. Brice
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Elberta, Alabama

Received In Office

Sept 19, 1963

Sheriff.

I have executed this summons

this Sept 20 1963

by leaving a copy with

Mrs H Rummel

Sheriff claims _____

Ten Cents per mile Total \$ 2.40

BY Taylor Wilkins Sheriff
G. E. Wilkins DEPUTY SHERIFF

Wm. J. Wilkins Sheriff.

Harold L. Duran Deputy Sheriff.

G. E. Wilkins