STATE BANK OF ELBERTA,

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

MRS. H. RUMMEL,

DEFENDANT

AT LAW, NO. 5713

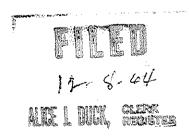
WITHDRAWAL OF APPEARANCE

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



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. Rumel, 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 Attorney For Defendant

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

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STATE BANK OF ELBERTA, a State Banking Corporation

PLAINTIFF

VS

MRS. H. RUMMEL

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW, NO. 57/3

DEFENDANT

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 not, 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

> for Plaintiff Attorney

SEP LA MEN

The State of Alabama,	Circuit Court, Baldwi	n County
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 der	nur, within thirty days from the service hereof	, to the complaint filed in
the Circuit Court of Baldwin Coun	ty, State of Alabama, at Bay Minette, against	
	Mrs. H. Rummel	, Defendant
byState B	ank of Elberta, a State Bankin	ng Corporation
		, Plaintiff
Witness my hand this19	day of	63
6 V- 9-20-63	Acres f -a	enck, Clerk
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	Mrs.	H. Ru	nnel	
				Defendants
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James A. Brice		
	Plaintiff's Attorney	
	Defendant's Attorney	

Defendant lives at Elberta, Alabama Received In Office ept 19, 1963 Sheriff. I have executed this summons by leaving a copy with

January Sheriff.

Garles & Register Deputy Sheriff.