

STATE OF ALABAMA )  
COUNTY OF BALDWIN )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MRS. JOE RYBAR to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against her in Circuit Court, at Law, for said County and State by DR. THEODORE L. GAIL, and at the same time and place you are to make return of your actions hereunder.

Given under my hand and seal this the 30 day of July, 1964.

*Alice L. Duck*  
Clerk of Court

DR. THEODORE L. GAIL, )

Plaintiff )

-vs- )

MRS. JOE RYBAR, )

Defendant )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVENTY-FIVE (\$475.00) DOLLARS, due by promissory note made by her on to-wit: May 5, 1964, which sum of money, with interest thereon, is still due and unpaid; and Plaintiff avers that in and by the terms of said note, Defendant waived all rights of exemption under the laws of the State of Alabama, and the Plaintiff claims of the Defendant the additional sum of ONE HUNDRED (\$100.00) dollars as attorney's fees for bringing this suit for that the Defendant in and by the terms of said note agreed to pay a reasonable attorney's fee for the bringing and prosecuting of this suit.

*James B. Bailey*  
SOLICITOR FOR PLAINTIFF

EX-8-3-64  
FILED

JUL 30 1964

ALICE L. DUCK, CLERK  
REGISTER

76-6131

BILL OF COMPLAINT

DR. THEODORE L. GAIL,

Plaintiff

-vs-

MRS. JOE RYBAR,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Defendant may be served in  
Silverhill, Alabama

Ernest M. Bailey, Attorney  
for Plaintiff

Received 30 day of July 19 66  
And on 3 day of Aug 19 66  
I served a copy of this within 24 hours  
to Mrs. Joe Rybar  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By [Signature]

[Signature]

Sheriff claims 60 miles at 60  
Ten Cents per mile Total \$ 6.00  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

DR. THEODORE L. GAIL,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	
	)	AT LAW
MRS. JOE RYBAR,	)	
	)	NO. 6131
Defendant.	)	

DEMURRER

Now comes the defendant, by her attorney, and demurs to the complaint filed heretofore in this cause and to each and every count thereof, separately and severally, and for grounds of the said demurrer assigns, separately and severally, the following:

1. It does not state a cause of action.

WILTERS, BRANTLEY & NESBIT

BY: *Charles S. Nesbit*  
Attorney's for Defendant

Defendant demands a trial of said cause  
by jury.

WILTERS, BRANTLEY & NESBIT

BY: *Charles S. Nesbit*  
Attorney's for Defendant

FILED

SEP 8 1964

ALICE L. DUCK, CLERK  
REGISTER

6131  
No. 6131

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

DR. THEODORE L. GAIL,  
Plaintiff,

VS.

MRS. JOE RYBAR,  
Defendant.

SUMMONS AND COMPLAINT

WILTERS, BRANTLEY & NESBIT

Attorney's for Defendant.