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The State of Alabama, Baldwin County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Rae B. Luders Walker

to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of

Elmer O. Ericson, as Receiver of and for Rogers Park National Bank, a Corporation.

Witness this 21 day of May, 1935

Robert S. Deach, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

<u>Elmer O. Ericson, as Receiver</u> <u>of and for Rogers National</u> <u>Park National Bank, a Corporation</u> Plaintiff	VS.	<u>Rae B. Luders Walker</u> Defendant
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And the Plaintiff claims of the Defendant One Hundred Sixty Four & 5/100

(\$164.05) Dollars, ~~the~~

balance due on promissory note made and executed by defendant, on to-wit.:- August 17, 1931, and due and payable September 16 1931, with interest at 7% per annum after maturity, which sum of money with the interest thereon from Jan. 22, 1932 at the rate of 7 % is still due and unpaid.

Count Two.

Plaintiff claims of the defendant the further and additional sum of \$35.00 as a reasonable attorneys fee for suit on this note, and plaintiff avers that in said note defendant agreed to pay a reasonable attorneys fee, and that the above amount is a reasonable attorney's fee for suit on the note sued on in this cause.

W. H. Lawrence
 Attorney for Plaintiff.

RECORDED

Original
No. 147 RECORDED

The State of Alabama
Baldwin County
CIRCUIT COURT

Elmer O. Epison, receiver
Rogers Park Nat. Bk. Plaintiff
vs.

Rae B. Luders Walker
Defendant.

Summons and Complaint

Filed this 21st day of
May 19 35
Robert S. Dunch
Clerk.

W. H. Hawkins Plaintiff's Attorney.

\$12.00 deposited for costs
by W. H. Hawkins Atty.
5/21/35.

Received this 21 day
of May, 19 35
Matt. Wilkins Sheriff.

Executed this May 25 day
of May, 19 35, by
leaving a copy of the within Summons and Com-
plaint with

Rae B. Luders Walker
Defendant.
Matt. Wilkins
C. M. Anderson D. S. Sheriff.

The State of Alabama,
COUNTY

To the Sheriff of _____ County:

Whereas, the Plaintiff in the within stated
cause has made affidavit and given bond as
required by law, you are hereby required to
take the property mentioned in the complaint
into your possession, unless the Defendant
give bond payable to the Plaintiff with
sufficient surety in double the amount of the
value of the property, with condition that if the
Defendant

cost in the suit,
within thirty days thereafter, deliver the property
to the Plaintiff, and pay all costs and damages
which may accrue from the detention thereof.

_____, Clerk.

Jury List First Week, April 13, 1936.

NO.	NAME	OCCUPATION	ADDRESS
1	Ambrose Hamburg	Laborer	Foley
2	Cecil Trawick	Farmer	Stapleton
3	Philip Fulford	Oysterman	Bon Secour
4	Allen Pilgrim	Clerk	Miflin
5	Otis Scott	Farmer	Stockton
6	Jacob Krischer	Farmer	Elberta
7	Will Younce	Farmer	Foley
8	Floyd Taylor	Farmer	Bay Minette
9	John W. Spalding	Farmer	Foley
10	Galen C. Berg	Farmer	Foley
11	Irbey Heaton	Naval Stores	Bay Minette
12	Dupree McNeil	Farmer	Holman
13	Thomas L. G. Vail	Printer	Bay Minette
14	Clyde Robinson	Farmer	Belforest
15	Jim Beck	Clerk	Belforest
16	John Thompson	Ice Man	Foley
17	William Thomas	Merchant	Foley
18	James Parker	Laborer	Foley
19	Elbert Boone	Oil Truck	Foley
20	Ernest D. Swift	Clerk	Fairhope
21	Cleveland C. Gantt	Merchant	Little River
22	Hobson Bush	Farmer	Bay Minette
23	Joe C. Callaway	Fisherman	Bon Secour
24	William Lenz	Garage	Elberta
25	John H. Helmeir	Mechanic	Foley
26	Aubrey Allen	Fisherman	Bon Secour
27	Robert C. Gwaltney	Clerk	Robertsdale
28	Oscar Grubbs	Farmer	Robertsdale
29	Henry Bauer	Farmer	Point Clear
30	Frank Heidleberg	Farmer	Silverhill
31	Shelby Folmar	Farmer	Bay Minette
32	Carl White	Farmer	Bay Minette
33	Louis Bush	Clerk	Bay Minette
34	Gus Murphy	Farmer	Bay Minette
35	J. Mack Blackman	Farmer	Bay Minette
36	Virgil V. Rhodes	Dairyman	Bay Minette
37	Charles T. Sims	Printer	Bay Minette
38	Henry Miller	Farmer	Bay Minette
39	William A. Thompson	Insurance	Bay Minette
40	Verner Ray	Printer	Bay Minette

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wasden

P/THH 1
2/THH 1

ELMER O. ERICSON, as Receiver
of and for Rogers Park National
Bank, a Corporation,

Plaintiff,

VS.

RAE B. LUDERS WALKER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Comes the Defendant and for answer to the Plaintiff's
complaint, and to each count thereof, separately and severally,
says:

FIRST:

That the facts therein alleged are untrue.

Berke & Hall
Attorneys for Defendant.

The Defendant demands a trial by jury.

Berke & Hall
Attorneys for Defendant.

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RECORDED
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ELMER O. ERICSON, as Receiver
of and for Rogers Part Nation-
al Bank, a Corporation,

Plaintiff,

VS.

RAE B. LUDERS WALKER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

ANSWER:

Filed this 24 day of June,
1936.

Robert H. Duck
Clerk.

EDMER O. ERICSON, as Receiver
of and for Rogers Park National
Bank, a Corporation,

Plaintiff,

vs.

RAE B. LUDERS WALKER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

And now comes the Defendant and amends her answer heretofore filed in this cause and in addition to the answer heretofore filed, and to each count thereof, separately and severally, says:

ONE:

That the note sued on was made to secure money loaned by the Rogers Park National Bank, a Corporation, to Fred C. Luders, the husband of the Defendant; that the indebtedness is that of the said Fred C. Luders, and not that of the Defendant.

TWO:

That the note sued on was given for money loaned by the Rogers Park National Bank, a Corporation, to Fred C. Luders, the husband of the Defendant; that the Bank knew at the time that the money was being loaned to and to be used by the said Fred C. Luders, and that the Defendant was the wife of the said Fred C. Luders.

THREE:

That the note sued on was given for money loaned by the Rogers Park National Bank, a Corporation, to Fred C. Luders, the husband of the Defendant; that the said Bank knew that the money was to be, and was actually used by the said Fred C. Luders; that it required as collateral security on the note stock belonging to the said Fred C. Luders, and which the said Bank knew belonged to him; that the said Bank knew that the debt was that of the said

Fred C. Luders and not of the Defendant.

~~Fourth: That there was no Consideration for
the execution of said note~~ ~~Barker & Hall~~
~~Attorneys for Defendant.~~

Fourth: That there was no Consideration
for the execution of the note in
issue

Barker & Hall
Attys for Deft

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7-299-300

ELLER O. ERICKSON, as
Receiver of and for Rogers
Park National Bank, a
Corporation,

Plaintiff,

VS.

RAE B. LUDERS WALKER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

AMENDED ANSWER

Filed this 3 day of
September, 1935.

Robert S. Duck
Clerk.