

680

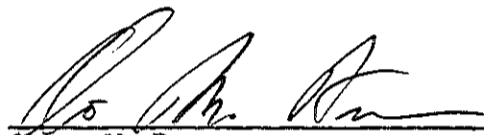
DEMUR

S. D. SOSENKO,  
Complainant  
vs  
JOE SUBEL,  
DEFENDANT.


IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW:

Comes now the defendant and demurs to each and every allegation of the Plaintiff's Complaint; separately and severally says;

1. That he is not guilty.
2. That the facts therein alleged are untrue.
3. There was no consideration for the execution of said note.

  
Orvis M. Brown, Attorney for  
Joe Subel

Defendant demands a trial by jury.

  
Orvis M. Brown, attorney for  
Joe Subel

S. D. SOSENKO,

Complainant

vs

JOE SUBEL,

Defendant

FILED  
JAN 10 1964  
BALDWIN COUNTY, ALA.  
CLERK OF COURT

RECEIVED  
JAN 10 1964  
BALDWIN COUNTY, ALA.  
CLERK OF COURT

DEMUR

S. D. SOSENKO,

Complainant

vs

JOE SUBEL,

Defendant.

*Filed August 22, 1941*  
*R. S. Duck, Clerk*

ORVIS M. BROWN  
 ATTORNEY FOR DEFENDANT  
 ROBERTSDALE, ALABAMA

S. D. SOSENKO,

Complainant

vs

JOE SUBEL,

Defendant.

JOE SUBEL, Defendant, vs S. D. SOSENKO, Complainant.

JOE SUBEL, Defendant, vs S. D. SOSENKO, Complainant.

JOE SUBEL, Defendant, vs S. D. SOSENKO, Complainant.

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JOE SUBEL, Defendant, vs S. D. SOSENKO, Complainant.

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE  
STATE OF ALABAMA

You are hereby commanded to summon JOE SUBEL  
to appear within thirty days from the service of this writ  
in the circuit court, to be held for said County at the  
place of holding the same, then and there to answer the com-  
plaint of S. D. SOSENKO.

Witness my hand, this 24<sup>th</sup> day of July, 1941.

R. S. Duck  
Clerk

S. D. SOSENKO,  
Plaintiff )

vs. )

JOE SUBEL,  
Defendant )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

The Plaintiff claims of the Defendant the sum of  
\$288.13, due by promissory note made by him on the 1st day of  
February, 1935 and payable six (6) months after date thereof;  
with interest thereon from its date at the rate of 8% per  
annum.

Plaintiff further alleges that in and by the said  
note the Defendant waived all right of exemption as to person-  
al property under the Constitution and Laws of the State of  
Alabama as to the said debt and the Plaintiff claims the bene-  
fit of said waiver.

Plaintiff further alleges that in and by the said  
note the Defendant agreed to pay all costs of collecting or  
attempting to collect or to secure the said note, including a  
reasonable attorney's fee, and the Plaintiff claims the sum of  
\$50.00 as a reasonable attorney's fee.

BEEBE & HALL  
Attorneys for Plaintiff

By: W C Duke

this 22 day of July, 1941  
W. R. STUART, Sheriff

S. D. Sosenko,  
Plaintiff,

Vs.

JOE SUBEL,  
Defendant.

SUMMONS & COMPLAINT.

Executed July 29<sup>th</sup> 1941  
by serving copy of within Summons and  
Complaint on

Joe Subel.

W.R. Stuart Sheriff  
B. F. Kneen, Ds.

(680)

Filed July 24, 1941  
P. S. Duck, Clerk