(681)

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon CHARLES 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 complaint of S. D. SOSENKO.

Witness my hand, this day of July, 1941.

H.S. Duch Clerk

S. D. SOSENKO,
Plaintiff

IN THE CIRCUIT COURT OF

VS.

CHARLES SUBEL,

Defendant

BALDWIN COUNTY, ALABAMA

The Plaintiff claims of the Defendant the sum of \$171.49, 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.

Plaintiff further alleges that in and by the said note the Defendant waived all right of exemption as to personal property under the Constitution and Laws of the State of Alabama as to the said debt and the Plaintiff claims the benefit 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: M Belle

S. D. SOSENKO,
Plaintiff,

Vs.

CHARLES SUBEL, Defendant.

SUMMONS & COMPLAINT.

Executed July 29 th 104/ by serving copy of within Summons and Complaint on

Charles Subel

By B & Kneua Deputy Sheriff

Filed guly 2 4,1947 June Click DEMUR

S. D. SOSENKO,

Complainant

vs

CHARLES SUBEL,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW:

Defendant.

Now comes the Defendant and demurs to each and every allegation thereof, separately and severally says:

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

CAVIS M. BROWN, ATTORNEY FOR CHARLES SUBEL

Defendant demands trial by jury.

ORVIS M. DEFENDANT

(29)

Commercial and the commercial com

S. D. SOSENKO,

Complainant

٧s

CHARLES SUBEL

Defendant.

ORVIS M. BROWN ATTORNEY FOR DEFENDANT ROBERTSDALE, ALABAMA

Filed August 22, 1941 R.S Duch, Club