

PEOPLES FERTILIZER COMPANY,  
Plaintiff,

NO. 862

L A W

Vs.

JERRY VASKO,

Defendant.

CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

1. The Defendant, for answer to the complaint, says that he is not indebted in manner and form as alleged.

2. The Defendant, as a defense to the action of the Plaintiff, says that on to-wit the first day of July, 1942, he was the owner of approximately eight acres of field corn which, in his absence, he had arranged for an older brother to harvest, sell and apply the proceeds of the payment of the note here sued upon, but which said brother was unable to do because one Hardy, a servant or agent for Plaintiff, forbade Defendant's brother to harvest the corn, asserting Plaintiff claimed same under his note and would do said harvesting which Plaintiff did not do, and thereby caused the corn to spoil in the field to Defendant's damage, in the sum of Two Hundred and Fifty-four Dollars, and which amount Defendant sets off as against Plaintiff's demand.

*Elliot S. Rindley*  
Attorney for Defendant

862

PEOPLES FERTILIZER COMPANY,  
Plaintiff,

vs.

JERRY VASKO,  
Defendant

PLEAS

*new from 571944  
C. J. Vasko*

STATE OF ALABAMA,  
BALDWIN COUNTY.

)  
) IN THE CIRCUIT COURT-LAW SIDE.  
)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Jerry Vasko 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 same, then and there to answer the Complaint of Peoples Fertilizer Company, a Corporation.

Witness my hand this 14 day of May, 1944.

R. L. Deek  
Clerk.

COMPLAINT.

PEOPLES FERTILIZER COMPANY,  
A CORPORATION,

Plaintiff,

VS.

JERRY VASKO,

Defendant.

)  
) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA.  
)  
) LAW SIDE.  
)  
)

Plaintiff claims of the Defendant the sum of Three Hundred Fourteen and 85/100 Dollars (\$314.85) due by Promissory Note made by him on to-wit, March 30, 1942, payable on to-wit, June 1st, 1942, together with interest thereon.

The Plaintiff avers that in, by and as a part of said note the Defendant waived all rights of exemption under the Constitution and laws of Alabama or any other State as to personal property and of this waiver the Plaintiff now claims the benefit.

Plaintiff further alleges and avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure said note, including a reasonable attorneys fee should the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Seventy-five Dollars (\$75.00) as such reasonable attorneys fees.

Robert H. Mason  
Attorneys for Plaintiff.

862

SUMMONS AND COMPLAINT.

PEOPLES FERTILIZER COMPANY,  
A CORPORATION,

Plaintiff,

VS.

JERRY VASKO, Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

FILED MAY 19, 1944.

*[Signature]*  
Clerk.

LAW OFFICES  
HYBART & CHASON  
Bay Minette, Alabama

Executed May 29 1944  
by serving copy of within Summons and  
Complaint on

Jerry Vasko

Wm. S. Stuart Sheriff

by B. R. J. J. J. J. Deputy Sheriff

862