STATE OF ALABAMA

BALDWIN COUNTY

# IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon R. C. Russell to appear within thirty days in the Circuit Court to be held in said County at the place of holding same, then and there to answer the Complaint of Raphael's, Inc., a corporation.

Cunian B. Blockmon

RAPHAEL'S, INC., a	X	
corporation,  Plaintiff,	χ	IN THE CIRCUIT COURT OF
rialiter,	χ	BALDWIN COUNTY, ALABAMA
vs.	X	
R. C. RUSSELL,	χ	AT LAW NO. 20116
Defendant.	χ	

### COMPLAINT

The Plaintiff claims of the Defendant the sum of One Thousand Three Hundred Five Dollars and Forty-five Cents (\$1,305.45) due from him by account on, to-wit, November 20, 1970, which sum of money with interestathereon is still unpaid.

An itemized statement of account sued on verified by Affidavit of a competent witness is attached hereto and made a part hereof.

CHASON, STONE & CHASON

Attorneys for Plaintiff

EUNICE B. BLACKRON SINGUIT

290 Malls

BATTLE HOUSE BUILDING
CORNER ROYAL AND ST. FRANCIS STREET
MOBILE. ALABAMA 35502

Sold to:

TELEPHONE 432-7541

MR R C RUSSELL P O BOX 412 SPANISH FORT ALA 36527

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TELEPHONE 432.7541

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TELEPHONE 432-7541

BATTLE HOUSE BUILDING CORNER ROYAL AND ST. FRANCIS STREET MOBILE, ALABAMA 36602

Sold to:

MR ROBERT C RUSSELL FAIRHOPE ALA 36532

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Exclusive Ladies Ready to Wear

STATE OF ALABAMA
MOBILE COUNTY

Before me, the undersigned authority, personally appeared Rebecca Ann Schulz, who is known to me and who, after being by me first duly and legally sworn, did despose and say under oath as follows:

That her name is Rebecca Ann Schulz and that she is Credit Manager of Raphael's, Inc., a concern having its principal place of business in Mobile, Mobile County, Alabama. That she has personal knowledge of the books and records of Raphael's, Inc. and that the account attached hereto owed to Raphael's, Inc. by R. C. Russell is true and correct and that the amount shown thereon as due and payable is justly due and owed to Raphael's Inc. by the said R.C. Russell after allowing all credits and off-sets and that the same is due and unpaid and has been due and unpaid since November 20, 1970.

Rebecca Ann Schulz

Sworn to and subscribed before me this \_\_\_\_\_ day of November, 1971.

Notary Public, Mobile County, Alabama

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By Manufer D.S.

STATE OF ALABAMA

BALDWIN COUNTY

# IN THE CIRCUIT COURT - LAW SIDE

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Eunice B. Blackman

RAPHAEL'S, INC., a	X	
corporation,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	DIAMA
vs.	X	BALDWIN COUNTY, ALABAMA
	X	at law No. 10 1/6
R. C. RUSSELL,	X	
Defendant.		

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CHASON, STONE & CHASON

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NOV 11 1971

attorneys for Plaintiff

EUNICE B. BLACKMON CHECUIT

BATTLE HOUSE BUILDING CORNER ROYAL AND ST. FRANCIS STREET TELEPHONE 438-7541 MOBILE, ALABAMA 35602

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SATILE HOUSE BUILDING CORNER ROYAL AND ST. FRANCIS STREET MOBILE, ALABAMA 36602

TELEPHONE 432-7541

Sold to: MR R C RUSSELL P 0 BOX 412 SPANISH FORT ALA 36527

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Exclusive Ladies Ready to Wear

BATTLE HOUSE BUILDING
CORNER ROYAL AND ST. FRANCIS STREEL
M O BILE. ALABAMA 36602

TELEPHONE 432-7541

MR ROBERT C RUSSELL FAIRHOPE ALA 36532

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Exclusive Ladies Ready to Wear

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Rebecca Ann Schulz

Sworn to and subscribed before, me this \_\_\_\_\_ day of November,

1971

Notary Public, Mobile County, Alabama

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### CHASON, STONE & CHASON

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON NORBORNE C. STONE, JR. JOHN EARLE CHASON EBERHARD E. BALL PHONE 937-2191

January 6, 1972

Mrs. Eunice B. Blackmon Circuit Clerk Eay Minette, Alabama 36507

Dear Mrs. Blackmon:

Re: Raphaelis, Inc. vs.

R. C. Russell
Case No: 10,116

We received a notice today from you that the Summons and Complaint in the above case had been returned by the Sheriff marked "Not Found".

We discussed this with our client and he informs us that the Defendant, R. C. Russell, lives on Highway 90 in Baldwin County, Alabama about 3 miles East of Malbis across from the Fields Brothers Farm or Ranch.

Would you please return these papers to the Sheriff's Department to whom we are sending a copy of this letter.

Thanking you for your attention to ---

we are

sincerely,

CHASON, STONE & CHASON

BY:

NCS:lp

cc: Sheriff's Department
Bay Minette, Alabama

#### CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON NORBORNE C. STONE, JR. JOHN EARLE CHASON EBERHARD E. BALL

January 6, 1972

TELEPHONE 937-2191

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Thanking you for your attention to this request, we are

BY:

Sincerely,

CHASON, STONE & CHASON

NCS:lp

cc: Sheriff's Department

Bark, 6.72

Bay Minette, Alabama