

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

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.

Eunice B. Blackmon
Clerk

RAPHAEL'S, INC., a
corporation,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

vs.

X

X

AT LAW

NO. 10116

R. C. RUSSELL,

X

Defendant.

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 interest thereon 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

BY:

Charles E. Ball
Attorneys for Plaintiff

FILED

NOV 11 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Raphael's

TELEPHONE 432-7541

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

Sold to:

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

TEAR OFF AND RETURN THIS STUB WITH CHECK
CANCELLED BANK CHECK IS YOUR RECEIPT.

AMOUNT PAID \$

CLERK	ITEMS	CHARGES	TAX	CREDITS	DATE	BALANCE
		Balance Forwarded				
26	DRESS	40.00				
	DRESS	46.00				
	DRESS	37.00				
	POSTAGE	1.50				
23	BAG	26.00				
	POSTAGE	.75				
61	SHOES	9.97	.60		JUN 16 70	161.82 *
60	SHOES	16.90				
	SHOES	18.00				
	POSTAGE	1.00				
20	PANTS SUIT	115.00				
	SWEATER	37.00				
23	SUIT	110.00				
26	SLACK SET	66.00				
26	RAINCOAT	75.00				
	POSTAGE	5.00				
27	BAG	55.00			AUG 24 70	685.72
	BAG	25.00				
26	COAT	55.00			AUG 26 70	741.97
	POSTAGE	1.25				
20	SWEATER	17.98				
	VEST	17.98				
	JACKET	29.98				
	SLACKS	23.98				
	SKIRT	17.00				
29	SUIT	89.98				
	POSTAGE	3.00				
H	COAT	80.00			AUG 29 70	1,093.8
	COAT	69.98				
	POSTAGE	2.00				

Exclusive Ladies Ready to Wear

RAFAEL

Raphael's

TELEPHONE 432-7541

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

Sold to:

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

AMOUNT PAID \$

TEAR OFF AND RETURN THIS STUB WITH CHECK
CANCELED BANK CHECK IS YOUR RECEIPT.

CLERK	ITEMS	CHARGES	TAX	CREDITS	DATE	BALANCE
		Balance Forwarded			SEP 1 70	1,093.85 *
MM	SUIT RTD			110.00		
MM	RAIN COAT RTD			75.00	SEP 1 70	908.85 *
MM	3 COATS RTD			204.98	SEP 9 70	703.87 *
61	SHOES	30.00	1.80			
JM	SWEATER, VEST AND JACKET, SLACKS AND SKIRT RTD			106.92	OCT 24 70	628.75 *
15	BAG	45.00				
	POSTAGE	1.00			NOV 20 70	674.75 *

Exclusive Ladies Ready to Wear

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
Rebecca Ann Schulz

Sworn to and subscribed before
me this 19 day of November,
1971.

[Signature]
Notary Public, Mobile County, Alabama

NOV 11 1971

EUNICE B. BLACKMON, CIRCUIT CLERK

Not found in my county after diligent search and inquiry.

6 Jan 72
74

Sheriff claim: Unsubd. Property StC
Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS, Sheriff

MOBILE COUNTY, ALA.
JAN 9 1972

NOT FOUND IN WALKER COUNTY
Date: 1-19-72
By: [Signature]
Deputy Sheriff

RETURNED 5-17-72
Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff
By: [Signature] D.S.

NOV 11 1971
EUNICE B. BLACKMON CIRCUIT CLERK
MAY 8 1972
E.E. Ball

(New Address)
P.O. Box 61
BURNWELL, AL. 35038
(Walker Co.)

NOV 11 1971
TAYLOR WILKINS
SHERIFF

Spanish Fort B-6
Case 10,116
N.C.
Raphael's, Inc.
a Corp
(1711 South St. Mobile)
R.C. Russell
Pecan Farm on
U.S. 90
Loxley, Al.

RETURNED 5-31-72
Not found in my County after diligent search and inquiry. [Signature]
RAY D. BRIDGES, Sheriff
By: [Signature] D.S.

163
STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

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Clerk

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corporation,

Plaintiff,

vs.

R. C. RUSSELL,

Defendant.

X

X

X

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO.

10 116

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CHASON, STONE & CHASON

FILED

NOV 11 1971

BY:

Charles L. E. Ball

Attorneys for Plaintiff

Raphael's

TELEPHONE 432-7541

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

Sold to:

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

432-7541

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29	SUIT	89.98				
	POSTAGE	3.00				
H	COAT	80.00				
	COAT	69.98				
	POSTAGE	2.00			AUG 29 '60	1,093.85 *

Exclusive Ladies Ready to Wear

Raphael's

TELEPHONE 432-7841

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

Sold to:

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

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Exclusive Ladies Ready to Wear

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

Sold to:

MR ROBERT C RUSSELL
P O BOX F 131
FAIRHOPE ALA 36532

TEAR OFF AND RETURN THIS SLIP WITH CHECK
CANCELLED BANK CHECK IS YOUR RECEIPT.

AMOUNT PAID \$.....

CLERK	ITEMS	CHARGES	TAX	CREDITS	DATE	BALANCE
		Balance Forwarded				
	FUR COAT	595.00	35.70		OCT 24 10	630.70 *

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
Rebecca Ann Schulz

Sworn to and subscribed before
me this 9 day of November,
1971.

L. B. [Signature]
Notary Public, Mobile County, Alabama

FILED

NOV 11 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

T. L. SHERIFF

Received 11 day of November 1976
and on _____ day of _____ 19____
I served a copy of the within D & C
on R. C. Russell
By service on _____
TAYLOR WILKINS, Sheriff
D. S.

[illegible]

Ed S

W. C. Wood

1911 Dec 11

W. H. C.

77224

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

C
O
P
Y

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

Dear Mrs. Blackmon:

Re: Raphael's, 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 this matter,

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

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

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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 this request,
we are

Sincerely,

CHASON, STONE & CHASON

BY: 

*Back to Sheriff
1-6-72*

NCS:lp
cc: Sheriff's Department
Bay Minette, Alabama