

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY
(DECEASED)

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

6 October 1954

2401

Mrs. Alice J. Duck
Clerk Circuit Court
Bay Minette, Ala.

Dear Mrs. Duck:

Re: Bank of Fairhope
Vs: Capt. George H. Smith

Enclosed find summons and complaint for suit of Bank
of Fairhope against Captain George H. Smith.

Please process and oblige.

Yours very truly,


E. G. Rickarby, Jr.

R/i

cc: Capt. George H. Smith
Montrose, Ala.

cc: Bank of Fairhope
City

2055

26 Oct

BANK OF FAIRHOPE,
a Corporation,
Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-vs-

GEORGE H. SMITH,
Defendant

COMPLAINT

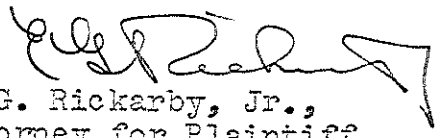
The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY-SIX and no/100 DOLLARS (\$186.00) due by promissory note made by him on the 4th day of December, 1953, payable on to-wit, the 5th day of February, 1954, with interest since maturity, and the Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal property as exempt to him under the Constitution and laws of the State of Alabama and agreed to pay an attorneys fee for the collection thereof and the Plaintiff hereby claims the further sum of Thirty-five Dollars (\$35.00) as such attorneys fee.

FILED

10-9-54

ALICE L. BUCK, CLERK

RICKARBY & RICKARBY

By: 
E. G. Rickarby, Jr.,
Attorney for Plaintiff.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Marshall Koehler, who is known to me and who deposes and says that my name is Marshall Koehler, that I am Bookkeeper for Pace Holland Company at Robertsedale, Alabama; that my duties include the keeping of accounts and the foregoing account of Warren and Locke show a balance due of \$ 744.14 is true and correct and the same is unpaid.

Marshall Koehler

Sworn to and subscribed before me

on this the 6 day of Aug. 1954.

Gray F. Gullett

Notary Public, Baldwin County, Alabama.

