

2462

GEORGE STEJSKAL,  
Complainant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

- VS -

R. B. CULVER,  
Defendant.

COMPLAINT

COUNT ONE: Complainant claims of the defendant the sum of Three Hundred Sixty Dollars (\$360.00), the rent of the house and lot known as 419 White Avenue, in the City of Fairhope, Baldwin County, Alabama, demised by the plaintiff to the defendant on the first day of June, 1954, said rent commencing on the 1st day of August, 1954, and ending the last day of December, 1954.

COUNT TWO: The plaintiff claims of the defendant the sum of Three Hundred Sixty Dollars (\$360.00) damages for breach of a lease entered into by defendant on the first day of June, 1954, whereby plaintiff agreed to lease his property known as 419 White Avenue, in the City of Fairhope, Baldwin County, Alabama, whereby the defendant agreed to lease said property from the plaintiff for the sum of Sixty Dollars (\$60.00) per month for the months of June, July and August, 1954, and Seventy-five Dollars (\$75.00) per month for the months of September, October, November and December, 1954, and the plaintiff says that although he has complied with all the provisions on his part, the defendant has failed to comply with the following provisions, that is, has failed to pay rent for the months of August, September, October, November and December, 1954, in the sum of Three Hundred Sixty Dollars (\$360.00), wherefore plaintiff sues.

Complainant further avers that as part of the consideration in said lease the defendant did agree to pay a reasonable attorney's fee and all costs should it become necessary for the

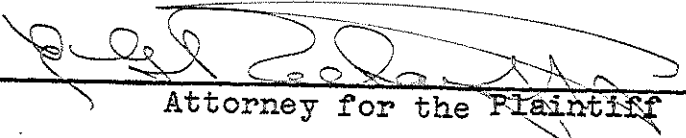
- 2 -

lessor to employ an attorney to collect any part of the rent to be paid, which plaintiff claims in the sum of Seventy-five Dollars (\$75.00); and plaintiff further alleges that because of the consideration in said lease the defendant did agree to waive all exemptions under the laws of the State of Alabama as against the collection of this debt.

FILED

12-6-54

ALICE J. BUCK, Clerk

  
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. 2462

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GEORGE STEJSKAL

R. B. CULVER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

R. B. CULVER

, Defendant

by GEORGE STEJSKAL

, Plaintiff

Witness my hand this 6th day of December 19 54

Wesley Hensch, Clerk

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GEORGE STEJSKAL,  
Complainant  
-vs-

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

R. B. CULVER, Defendant  
STATE OF ALABAMA  
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA--

GREETING:

WHEREAS, GEORGE STEJSKAL, hath complained on oath to me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, that he is justly indebted to him in the sum of Three Hundred Sixty Dollars (\$360.00); and the said George Stejskal having made affidavit and given bond as required by law in such cases: You are hereby commanded to attach so much of the estate of said R. B. CULVER as will be of value to satisfy the said debts and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, to be held at the Court House thereof, when and where you must make known how you have executed this writ.

Witness: Alice J. Duck, Clerk of said Court, my hand,  
this the 6th day of December, 1954.

Alice J. Duck  
Clerk

FILED

12-6-54

ALICE J. DUCK, Clerk

GEORGE STEJSKAL,

Complainant

-vs-

R. B. CULVER, Defendant

STATE OF ALABAMA

COUNTY OF BALDWIN

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA--

GREETING:

WHEREAS, GEORGE STEJSKAL, hath complained on oath to me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, that he is justly indebted to him in the sum of Three Hundred Sixty Dollars (\$360.00); and the said George Stejskal having made affidavit and given bond as required by law in such cases: You are hereby commanded to attach so much of the estate of said R. B. CULVER as will be of value to satisfy the said debts and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, to be held at the Court House thereof, when and where you must make known how you have executed this writ.

Witness: Alice J. Duck, Clerk of said Court, my hand,  
this the 6th day of December, 1954.

FILED

12-6-54

ALICE J. DUCK, Clerk

Alice J. Duck  
Clerk

GEORGE STEJSKAL,  
Complainant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

-vs-

R. B. CULVER,  
Defendant.

NOTICE

STATE OF ALABAMA  
COUNTY OF BALDWIN

Notice is hereby given that pursuant to the statutes therein made and provided, I have executed that certain writ of attachment issued out of the Circuit Court of Baldwin County, Alabama, wherein George Stejskal was plaintiff and R. B. Culver was defendant by levying upon the following described property as the property of said defendant, to-wit:

This \_\_\_\_\_ day of \_\_\_\_\_, 1954.

\_\_\_\_\_  
Sheriff of Baldwin County, Alabama.

FILED

12-6-54

ALICE L. LOCK, CLERK

GEORGE STEJSKAL,  
Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

-VS-

AT LAW

R. B. CULVER,  
Defendant.

AFFIDAVIT FOR ATTACHMENT

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me, FRANK VORL, a Notary Public in  
Baldwin County, State of Alabama, personally appeared GEORGE  
STEJSKAL, who being duly sworn, deposes and says that R. B.  
CULVER is duly indebted to him for the sum of Three Hundred Sixty  
Dollars (\$360.00) rent and said rent is due and said tenant  
failed and refuses after demand to pay the same and that this  
attachment is not sued out for the purpose of vexing or harras-  
sing the Defendant.

George Stejskal  
George Stejskal

Subscribed and sworn to before me this the 4 day of  
December, 1954.

Frank Vorl  
Notary Public, Baldwin County, Alabama.

Notary Public, State of Alabama at Large  
My commission expires Oct. 2, 1957.  
Bonded by The Employers Liability Assurance  
Corporation

FILED

12-6-54

NOTARY PUBLIC, ALABAMA

STATE OF ALABAMA:

COUNTY OF BALDWIN:

KNOW ALL MEN BY THESE PRESENTS that we, GEORGE STEJSKAL and STEVEN STEJSKAL and FRANK VOREL are firmly held bound unto R. B. CULVER in the sum of Seven Hundred Twenty Dollars (\$720.00) to be paid to the said R. B. Culver, his heirs, executors, administrators and assigns, for which payment we will and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors, administrators jointly and severally and firmly by these presents.

Sealed with our seals and dated this the \_\_\_\_ day of December, 1954.

The condition of the above obligation is such that Whereas the above bounded George Stejskal has on the date hereof prayed an attachment at the suit of George Stejskal against the estate of the above named R. B. Culver in the sum of Three Hundred Sixty Dollars (\$360.00) and has obtained the same returnable to the present term of the Circuit Court of Baldwin County, Alabama.

Now if said Plaintiff shall prosecute this attachment to effect and pay to the Defendant all such costs and damages that the said Defendant may sustain by reason of the wrongful and vexatious suing out of such attachment, then this obligation to be void, otherwise to remain in full force and effect.

George Stejskal  
George Stejskal

Steven Stejskal  
Bondsman

Frank Vorel  
Bondsman

Approved This  
6th day of Dec 1954  
Alice J. Buck, Clerk

FILED

12-6-54

ALICE J. BUCK, Clerk



LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

4 December 1954

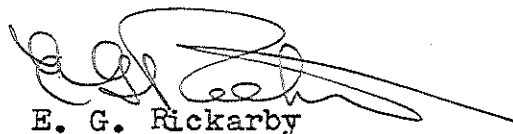
Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

STEJSKAL -vs- CULVER

Please process the enclosed attachment and send  
it to the Sheriff, with the enclosed. Thank you.

Yours very truly,



E. G. Rickarby

R/McR  
Enc.  
3090