

2579

INDUSTRIAL ACCEPTANCE CORPORATION,  
A Corporation

PLAINTIFF

VS

GUSTAV RIEMER, W. H.  
RIEMER, and R. T. TIEMER,  
Partners in business trad-  
ing under the name of  
RIEMERS COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendants TWO THOUSAND, SEVEN HUNDRED DOLLARS (\$2,700.00) due by ten (10) promissory notes in the sum of TWO HUNDRED SEVENTY (\$270.00) each made by the Defendants on, to-wit, the 20th day of May, 1954 and payable to the order of the George S. May Company, as follows: Note Number One (1) payable on, to-wit, the 30th day of May, 1954; Note Number Two (2) payable on, to-wit, the 9th day of June, 1954; Note Number Three (3) payable on, to-wit, the 19th day of June, 1954; Note Number Four (4) payable on, to-wit, the 29th day of June, 1954; Note Number Five (5) payable on, to-wit, the 9th day of July, 1954; Note Number Six (6) payable on, to-wit, the 18th day of July, 1954; Note Number Seven (7) payable on, to-wit, the 28th day of July, 1954; Note Number Eight (8) payable on, to-wit, the 7th day of August, 1954; Note Number Nine (9) payable on, to-wit, the 17th day of August, 1954, and Note Number Ten (10) payable on, to-wit, the 27th day of August, 1954, and the Plaintiff avers that said notes were transferred to the Plaintiff by endorsement for a valuable consideration before maturity and are now the property of the Plaintiff and the Plaintiff further avers by the terms of said notes the Defendants waive as to this debt all right to exemption under the Constitution and Laws of Alabama as to personal property, which sums of money together with interest thereon from maturity are still unpaid.

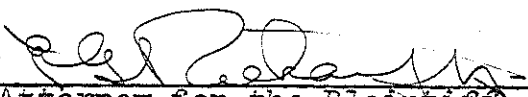
COUNT II

The Plaintiff further claims of the Defendants the sum of TWO HUNDRED EIGHTY-THREE DOLLARS and FIFTY CENTS (\$283.50). For that, by

the terms of the above-mentioned notes and as a part of the consideration thereof the Defendants agreed to pay the cost of collecting these notes, including a reasonable attorney's fee for the services of their attorney in collecting these notes, which sum of money together with the interest thereon from maturity of each of said notes is still unpaid.

RICKARBY AND RICKARBY

BY

  
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

--- Spring --- TERM, 1955

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GUSTAV RIEMER, W. H. RIEMER, AND R. T. TIEMER, Partners in business trading under the name of RIEMERS COMPANY.

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

GUSTAV RIEMER, W. H. RIEMER, AND R. T. TIEMER. Partners in business Defendant trading under the name of RIEMERS COMPANY.

by INDUSTRIAL ACCEPTANCE CORPORATION, a Corporation

\_\_\_\_\_, Plaintiff

Witness my hand this 1 day of April 1955

Henry J. Remick, Clerk

RECORDED

No. 2579

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The State of Alabama

Baldwin County

CIRCUIT COURT

Industrial Acceptance  
Corporation - a corp.  
Plaintiffs

vs.

Gustav Reimer, W. H.  
Reimer + R. L. Reimer  
Defendants

Summons and Complaint

Filed Apr 1 - 19 55

Alice L. Buck Clerk

FILED

APR 1 1955

ALICE L. BUCK, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

April 1 19 55

Myrtle Wilkins Sheriff

I have executed this summons

this 4-7 19 55

by leaving a copy with

Gustav Reimer

W R Reimer

R L Reimer

Myrtle Wilkins Sheriff  
Delia Reimer Deputy Sheriff

March 28, 1955

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

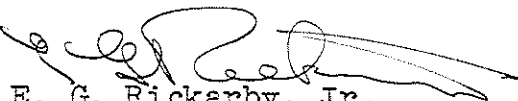
Dear Mrs. Duck:

With this letter we are handing you Complaint  
in the case of Industrial Acceptance Corpor-  
ation versus Gustav Riemer, et al.

Please process and issue Summons to each of  
the Riemers as Defendants.

I am also enclosing Client's check in the  
sum of \$15.00 to cover deposit for costs  
in this matter.

Yours very truly,



E. G. Rickarby, Jr.

EGR/mah  
Enclosures

cc: Mr. Cecil Chason  
Foley, Alabama

Mr. J. J. Coffey, Jr.  
Attorney at Law  
222 North Wells Street  
Chicago 6, Illinois