

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

11054

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HARRY RASKE to appear within thirty days from the service of this writ in the Circuit Court of said County at the place of holding same, then and there to answer the complaint of GRAMCO OF ALABAMA, INCORPORATED, a Corporation.

WITNESS my hand this 17 day of November, 1959.

Archie. Duck
Clerk.

Defendant's address;
Fairhope, Alabama.

Exp 12-1-59

GRAMCO OF ALABAMA, INCORPORATED,
A Corporation,

Plaintiff,

vs.

HARRY RASKE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

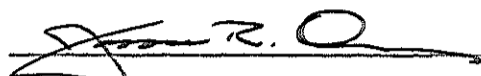
AT LAW.

COMPLAINT:

The Plaintiff claims of the Defendant FOURTEEN HUNDRED SEVENTY FIVE AND 81/100 DOLLARS (\$1475.81), the balance due on a promissory note made by the Defendant on April 21, 1959, and payable to the Plaintiff in 36 monthly installments, the first of which was due on June 1, 1959, which note is the property of the Plaintiff, which said amount, together with the interest thereon from October 6, 1959, at the rate of eight percent (8%) per annum, is still due and unpaid.

Plaintiff avers that in and by the terms of the said note the Defendant waived all rights of exemption as to personal property and agreed to pay a reasonable attorney's fee which might accrue in connection with the collection of the debt evidenced by said

note, which attorney's fee the Plaintiff alleges to be \$221.25,
and which it herewith claims.


Attorney for Plaintiff.

g Hope
4084

SUMMONS AND COMPLAINT

Received *18* day of *Nov* 19*59*
and on *1* day of *Dec* 19*59*
I served a copy of the within *Dec*
on *Mary Raske*
By service on _____

GRAMCO OF ALABAMA, INCORPORATED,
A Corporation,

Plaintiff,

vs.

HARRY RASKE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

TAYLOR WILKINS, Sheriff
By *Stadham*

Fairhope, Ala

Sheriff claims *20* miles at
Ten Cents per mile Total \$ *2.00*
TAYLOR WILKINS, Sheriff
BY *Stadham*
DEPUTY SHERIFF

FILED
NOV 17 1959

ALICE J. DUCK, CLERK
REGISTER

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

GRAMCO OF ALABAMA, INC.
A Corporation.

Plaintiff

-VS-

HARRY RASKE

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

P L E A S :

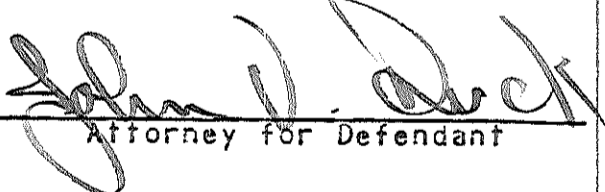
Comes the Defendant in the above styled cause and for
answer to the Plaintiff's complaint and each and every Count
thereof says:

ONE:

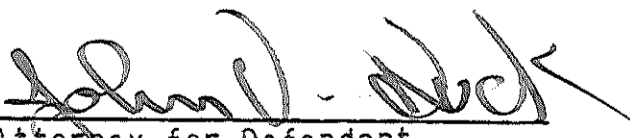
That the allegations of said complaint are untrue.

TWO:

That the Defendant for Answer to said complaint says:
That he has paid the debt for the recovery of which this suit
was brought, before such action was commenced.


Attorney for Defendant

Defendant demands a trial by Jury.


Attorney for Defendant

Filed
1-12-60

4054

FILED

JAN 12 1980

ALICE L. DUCK, CLERK
REGISTER

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.
Jan. 11th, 1960

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

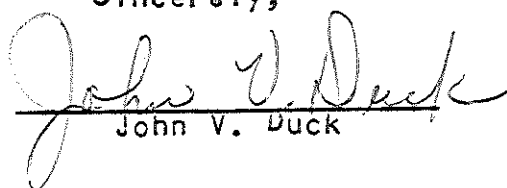
Dear Miss. Alice:

Enclosed you will find Pleas in the
case of Gramco -vs- Raske.

Please send one copy to Jimmy Owens.

JVD:oq
Encl:

Sincerely,


John V. Duck