

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

April 11, 1961

4684

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

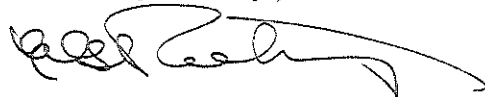
Dear Mrs. Duck:

Inre: Dr. Richard Putman
Vs: Mr. and Mrs. Paul Tuveson
Our File: 5319

Enclosed find Summons and Complaint in the above
styled cause, together with client's check in the
sum of \$25.00.

Please process and oblige.

Yours very truly,



EGR/ts
Encl.

cc: Messrs. McDonald and Marcus

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

P. O. BOX 71

May 2, 1961

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

Dear Mrs. Duck:

Inre: Putnam vs. Tuveson
Our File: 5319

Enclosed find Notice to Take Depositions in the above styled cause.

Please file same, and oblige. Copy of this notice has been sent to the attorney for defendants.

Yours very truly,



EGR/ts

Encl.

cc: (dup) Messrs. Donald & Marcus

RICHARD PUTMAN,

Plaintiff,

VS

PAUL TUVESON and
MRS. PAUL TUVESON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

CASE #4684

NOTICE TO TAKE DEPOSITIONS

To The Defendants Above, Namely: PAUL TUVESON and MRS. PAUL TUVESON, and ERNEST M. BAILEY, Attorney for the Defendants:

Please take notice that the Plaintiff herein will take, in the above entitled action to be used as authorized by Article 6A, Title 7 of the 1958 Code of Alabama, the depositions of PAUL TUVESON and MRS. PAUL TUVESON, defendants, whose address is "Greeno Road, Fairhope, Alabama", before an officer authorized to administer oaths under the Laws of the State of Alabama, who is not of counsel nor attorney for any of the parties to, nor relative nor employee of such counsel, or attorney, nor interested in this case, on Thursday, May 18, 1961, at 10:00 o'clock, A.M., in the office of E. G. Rickarby, Attorney for Plaintiff, Fairhope, Alabama, at which time and place you are hereby notified to appear and take such part in such examination as you may be advised, and as shall be fit and proper.

Done this the 1 day of May, 1961.


E. G. RICKARBY, Attorney for Plaintiff.

I hereby certify that a copy of this notice has this day been mailed to Mr. Ernest M. Bailey, Attorney for the defendants, by "Certified" mail.

Dated: 2 May, 1961.


E. G. Rickarby, Attorney for Plaintiff.

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

September 21, 1961

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

Dear Mrs. Duck:

Re: Putman vs. Tuveson
Our File: 5319
CASE NO: 4684

After talking with Judge Hall, I decided that I would like to have the judgment in the above styled case recorded.

Please prepare Certificate of Judgment, send it down to the Probate Court with instructions to have it recorded, charge it to my account, and oblige.

Yours very truly,



EGR/ts
cc: Messrs. McDonald and Marcus

RICHARD PUTMAN,

Plaintiff,

-VS-

PAUL TUVESON and
MRS. PAUL TUVESON,


Defendants.

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 FOUR HUNDRED AND FIFTY-ONE AND NO/100 (\$451.00) Dollars due by promissory note made by them on the 4th day of August, 1960, with interest at SIX PER CENT (6%) and payable on, to-wit, the 4th day of December, 1960; and the Plaintiff avers that in said note and as a part of the consideration thereof, the Defendants expressly agreed to pay a reasonable attorney's fee for the collection of said note, and which the Plaintiff claims is the sum of ONE HUNDRED AND NO/100 (\$000000) Dollars.


E. G. RICKABY, Attorney for
Plaintiff.

FILED

APR 19 1961

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mr. Paul Tuveson and Mrs. Paul

Tuveson

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 _____

Mr. Paul Tuveson and Mrs. Paul Tuveson, Defendant. S

by Richard Putman

_____, Plaintiff.

Witness my hand this

19

day of

April

1961

Reice J. Whack, Clerk

No. 14684 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

RICHARD PUTMAN

Plaintiffs

vs.

Mr. PAUL TUVESON and

Mrs. PAUL TUVESON

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

E. G. Bickarby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Greeno Road, Fairhope, Ala.

RECEIVED IN OFFICE

_____, 19 _____

_____, Sheriff

I have executed this summons

this 19 April, 19 41
by leaving a copy with

Paul Tuverson
Mrs Paul Tuverson

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. O. Garner Deputy Sheriff

I hope

PAUL TUVESON and
MRS. PAUL TUVESON,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ANSWER

Comes now the defendants in the above styled cause and for answer to the Bill of Complaint heretofore filed in this cause states, separately and severally:

I.

The defendants deny each and every allegation contained in said Bill of Complaint.

SOLICITOR FOR DEFENDANTS

For the trial of this cause
the defendants demand a trial
by jury.

FILED

APR 28 1967

ALICE J. DUCK, CLERK
REGISTER

Amey

4684

RICHARD PUTMAN,

Plaintiff

vs.

PAUL TUVESON and
MRS. PAUL TUVESON,

Defendants

ANSWER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

3-3879
No. _____ \$ _____, Florida, August 4th, 19 60

Dec 4, 1960 after date, for value received,

WE promise to pay to the order of DR. RICHARD PUTMAN

Four hundred fifty one and 00/00 DOLLARS,

at 11345 South Dixie Highway, Miami, Florida

with interest thereon at the rate of six (6) per cent. per annum from date until fully paid. Interest payable semi-annually. The maker and endorser of this note further agree to waive demand, notice of non-payment and protest; and in case suit shall be brought for the collection hereof, or the same has to be collected upon demand of an attorney, to pay reasonable attorney's fees for making such collection. Deferred interest payments to bear interest from maturity at Six per cent. per annum, payable semi-annually.

Due _____, 19____

Paul Tunison (Seal)
Mrs. Paul Tunison (Seal)