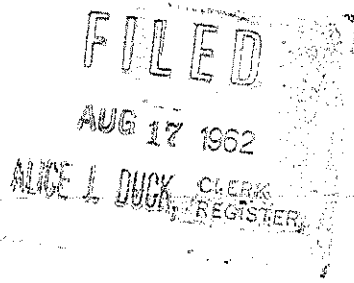


JAMES H. BARACO,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
CARLOS SUBEL,) AT LAW NO. 5056
Defendant.)

ANSWER

Now comes the defendant and for answer to the amended complaint heretofore filed in this cause, says:

1. Not guilty.
2. The allegations of the said amended complaint are untrue.



J. B. Blaschke
Attorney for Defendant

ANSWER

5056

JAMES H. BARACO,

Plaintiff,

VS.

CARLOS SUBEL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5056

JAMES H. BARACO,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
CARLOS SUBEL,) AT LAW NO. 5056
Defendant.)

DEMURRER TO COMPLAINT

Now comes the defendant, by his attorney, and demurs to the complaint and as grounds of such demurrer assigns, separately and severally, the following:

1. It does not state a cause of action.
2. It does not allege to whom the note described in the complaint was payable.
3. It does not allege that the note described in the complaint is the property of the plaintiff.


Attorney for Defendant

Defendant demands a trial of this cause by jury.


Attorney for Defendant

FILED

MAR 29 1962

ALICE J. DUCK, CLERK
REGISTER

~~5476~~
DEMURRER TO COMPLAINT

JAMES H. BARACO,

Plaintiff,

VS.

CARLOS SUBEL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5056

To have a certified transcript
made of this case and
to have the same filed
in the office of the
Clerk of the Court.

Respectfully,
JAMES H. BARACO

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Gomes the Plaintiff in the above styled cause and amends the Complaint heretofore filed therein by correcting the error in the spelling of the name of the Plaintiff from JAMES H. BARACO to JAMES H. BAROCO, and further amends the Complaint heretofore filed by striking Count One thereof and substituting therefor the following Count Two.

COUNT TWO

The Plaintiff claims of the Defendant One Thousand Dollars (\$1,000.00) due by Promissory Note made by him on, to-wit, January 18, 1961 and payable to the Plaintiff on or before ninety (90) days after date thereof, which sum of money with any legal interest chargeable thereon, the rate not being specified in said note, is still due and unpaid.

The Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay as attorney's fee, ten percent (10%) of the amount collected, of which Plaintiff now claims the benefit and further claims of the Defendant the further and additional sum of ten percent (10%) as such attorney's fee.

Attorney for Plaintiff

FILED
JUL 17 1962
FBI - BOSTON
RECORDED

STATE OF ALABAMA) IN THE CIRCUIT COURT . . LAW SIDE.
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon CARLOS SUBEL, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of JAMES H. BAROCO.

WITNESS my hand this 22 day of Feb, 1962.

Alice J. Duck
Clerk

Exp - 3-8-62

JAMES H. BARACO,
Plaintiff,

Vs-

CARLOS SUBEL,
Defendant.

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

COUNT 1

Plaintiff claims of the Defendant ONE THOUSAND DOLLARS (\$1,000.00) due by Promissory Note made by him on January 18, 1961 and payable on or before ninety (90) days after date, which sum of money with the interest thereon is still due and unpaid.

Plaintiff avers that in and by the terms of said note the Defendant agreed to pay ten per cent (10%) as the Attorney's fee and Plaintiff claims of the Defendant the further and additional sum of ten per cent (10%) of principal and interest as such attorney's fee.

[Signature]

Attorney for Plaintiff

FILED
FEB 22 1962
ALICE J. DUCK, CLERK
C. G. C.

No. 5056

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES H. BARACO, Plaintiff,

VS-

CARLOS SUBEL, Defendant

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF

Received 22 day of Feb 1962
and on 5 day of March 1962
I served a copy of the within of the
on Carlos Subel
By service on

TAYLOR WILKINS, Sheriff
By

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

February 12, 1962

Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint in the
case of James H. Baraco Vs. Carlos Subel.

Foley

Yours very truly,

C. G. Chason
C. G. Chason

CGC.bs