

The State of Alabama { No. ....  
Baldwin County

Circuit Court

Fall Term, 1917

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon M. Frank

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 M. Frank Defendant

by T. L. Moore Plaintiff

Witness my hand this 23rd day of July, 1917

*T. L. Moore* Clerk

COMPLAINT

T. L. Moore Plaintiff Versus M. Frank, Defendant.

The plaintiff claims of the defendant

the sum of Eighty and 00/100 (\$80.00) Dollars due by from him by account on To-wit: March 2nd, 1917.

The Plaintiff claims of the defendant the sum of Eighty and 00/100 (\$80.00) Dollars on an account stated between the plaintiff and the defendant on the to-wit: March 2nd, 1917.

The Plaintiff claims of the defendant the sum of Eighty and 00/100 Dollars due for merchandise, goods and chattels sold by the plaintiff to the defendant on the to-wit: March 2, 1917, which sum of money together with interest due thereon is still due and unpaid.

Handwritten calculation: 80, 00, 6.00, 1, 700

*1st Copy*

No. ....

**STATE OF ALABAMA,**  
BALDWIN COUNTY.  
**CIRCUIT COURT**

vs. Plaintiffs

Defendants

**SUMMONS AND COMPLAINT**

Filed ..... 191 .....

Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

191 .....

Sheriff

I have executed this Writ

this *Oct 17* ..... 191 .....

by leaving a copy of the within summons and complaint with

*M. Frank*

*W. E. Eubank* Sheriff

*W. Thomas* Deputy Sheriff.

State of Alabama

Baldwin County.

Before me, Henry S. Moore, a Notary Public in and for said County, in said State, personally appeared Charles Renoir, who being by me first duly and legally sworn doth depose and say: That he is personally acquainted with M.

Frank, and of his own knowledge knows that the said M. Frank is not in the Military Service of the United States Government, nor in any wise in the Service of said Government. Chas. Renoir,

Sworn to and subscribed before me May 20, 1918  
Henry S. Moore Notary Public

State of Alabama, }  
Baldwin County }

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, T. L. Moore

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court of said County, against

M. Frank

for the sum of Eighty and 00/100 Dollars and whereas, the said

T. L. Moore

has entered into bond, and made affidavit as required by law, that the said

M. Frank

is indebted to him in the sum of

Eighty

Dollars, and that process of garnishment is believed to be necessary

to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that The Baldwin County

Bank

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said The Baldwin County Bank

to be and appear at the next

term of the Circuit Court, to be holden for the County of Baldwin, on November 1917

then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you will not be indebted to him in the future by a contract then existing, and whether by a contract then existing, you are liable to him for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 23rd day of July, 1917

*T. W. Peterson*

Clerk.

3rd Original

No. ....

Circuit Court of Baldwin County.

VS. } Garnishment on Summons

Issued 24 day of July 1917

Filed July 24, 1917  
W. L. Williamson  
Attorney

Plf's Attorney.

Exhibit 7/4 1917  
See preceding copy  
of A. Williamson  
vs. J. B. Robertson  
Armed Bank  
Security Bank  
102 Boston

State of Alabama,  
Baldwin County

CIRCUIT COURT.

To any sheriff of the State of Alabama-Greeting:

Wheres, T. L. Moore has commenced suit by summons and Complaint returnable to the Fall term of Circuit Court of said County, against M. Frank for the sum of Eighty and 00/100 Dolars and whereas, the said T. L. Moore has entered into bond, and made affidavit as required by law, that the said M. Frank is indebted to him in the sum of Eighty Dollars, and that process of garnishment is beleived to be necessary to obtain of such judgment as may be recovered by Plaintiff, and that The Baldwin County Bank ~~and xxxxx~~ is beleived to be chargeable as garnishee in the cause.

You are therefore, commanded to summon the said Baldwin County Bank to be and appear at the next term of the circuit court to be holden for the County of Baldwin, on November, 1917, then and there to answer, upon oath, whether, at the time of service of this garnishment or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you will not be indebted to him in the future by a contract the existing, you are liable to him for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

THESE ARE, THEREFORE TO COMMAND YOU, that you will notify Defendant of the issuance of said garnishment.

Witness my hand, this 19th day of November, 1917.

  
Clerk.

Original

Executed by serving  
a copy of the within  
writ on Mr. Frank,  
this 21<sup>st</sup> day of Nov.

1917.

C. E. Cabot  
Sheriff

R. J. Cabot  
Deputy Sheriff

Filed 11/19/1917

J. W. Williams  
Clerk

BOND.

State of Alabama, }  
Baldwin County

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, *H. M. Moore, Louis de Boy, Kin*  
*John Covert*

are held and firmly bound unto *M. Frank*

in the sum of *One Hundred Sixty and 00/100 (\$160.00)* DOLLARS,

to be paid to the said *M. Frank, his*

heirs, executors, administrators or assigns; for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators jointly, severally and firmly by these Presents.

Sealed with our seals, and dated this *22nd* day of *July* 1917.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound

*T. L. Moore*

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court,

to recover of said *M. Frank*

the sum of *Eighty and 00/100 (\$80.00)* Dollars,

and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

*The Baldwin County Bank*

summoning *it* to answer what *it is* indebted to said Defendant, or what effects of said Defendant *it* has in *its* possession, or under *its* control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as *he* may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and *we* hereby severally certify that *we* have property free from all incumbrance, to the full amount of the above bond.

*H. M. Moore* [SEAL]  
*Louis de Boy* [SEAL]  
*John Covert* [SEAL]

Approved this *23rd* day of *July*, A. D., 1917.

*J. W. [Signature]* Clerk.

*Above named bondsmen are good and sufficient and would be accepted by me. [Signature] Clerk, Mobile Co. Ala*  
*7/23/17*



THE STATE OF ALABAMA,  
BALDWIN COUNTY.

H. D. Moorer, Notary Public  
Before me, ~~T. W. Richardson, Clerk of Circuit Court,~~

in and for said County, personally appeared T. I. Moore

who, being duly sworn, doth depose and say that

M. Frank

indebted to him in the sum of Eighty and 00/100 (\$80.00) Dollars,

and that he has commenced on suit by summons and complaint on said indebtedness against the said

M. Frank

and that The Baldwin County Bank is

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in its

possession, or under its control, and that he believes that process of Garnishment against the said

M. Frank

is necessary to obtain satisfaction of said claim; and that the said The Baldwin County Bank is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose of vexing or harassing said Defendant, or other improper motives.

*H. D. Moorer*

Sworn to and subscribed before me this 22nd day of July, 1917

*H. D. Moorer*

Clerk Circuit Court  
Notary Public.

116.

No. ....

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT

*Baldwin County*

*T. I. Moore*

Plaintiff

TO

*M. Frank*

Defendant

Bond and Affidavit in Garnishment on Summons

Filed this 24 day of July, 1917

*T. W. Richardson*

1917

Clerk