

## SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5214

JULY

TERM, 1962

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon PAUL E. GECK

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 \_\_\_\_\_

PAUL E. GECK, Defendantby G.W. WILKINSON, PlaintiffWitness my hand this 24 day of July 19 62.Alvin J. Duck, Clerk

Defendant resides at Loxley, Alabama.

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

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

vs.

Plaintiffs

Defendants

**SUMMONS and COMPLAINT**

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this 10 August, 1962

by leaving a copy with

Paul E. Heck

Taylor Wilkins Sheriff

P. A. McNeil Deputy Sheriff

G.W. WILKINSON,  
Plaintiff,  
VS.  
PAUL E. GECK,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN LAW NO. \_\_\_\_\_.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED THIRTY and NO/100 (\$230.00) DOLLARS, the balance due the Plaintiff by promissory note made by the Defendant on the 16th day of January, 1962, and payable in two (2) consecutive monthly installments of \$265.00, the first installment being due on the 25th day of January, 1962 and the second on the 25th day of February, 1962. Plaintiff further alleges that said note provided for interest at the rate of Eight (8%) Percent per annum.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of homestead and exemption as to personal property under the Laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note, the Defendant agreed to pay a reasonable attorney's fee should such fee be necessary in the collection of said note, and Plaintiff claims the further and additional sum of \$45.00 as a reasonable attorney's fee in the premises.

FILED

JUL 24 1962

ALICE J. DUCK, CLERK  
REGISTER

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
I served a copy of the within \_\_\_\_\_  
on \_\_\_\_\_

By service on \_\_\_\_\_

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

TAYLOR WILKINS, Sheriff  
By \_\_\_\_\_ D. S.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW ..... NO. *5214*

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G.W. WILKINSON,

Plaintiff,

VS.

PAUL E. GECK,

*Lopley* Defendant.  
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SUMMONS & COMPLAINT

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FILED

JUL 24 1962

ALICE J. DUCK, CLERK  
REGISTER

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J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahlberg Building

BAY MINETTE, ALABAMA

Judge Washburn:

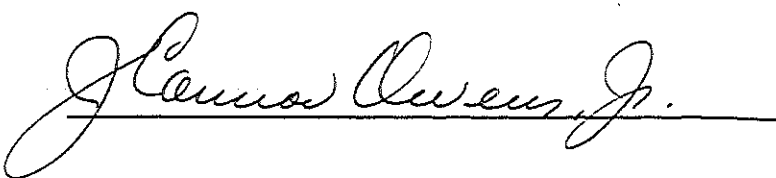
Please issue an order  
dismissing this garnishment  
as of June 2, 1965.

Thank you


Carol Owens

STATE OF ALABAMA       )  
                              (  
BALDWIN COUNTY         )

Before me, Alice J. Duck, Clerk of Circuit Court in and for said County, personally appeared J. Connor Owens, Jr., who, being duly sworn, doth depose and say: That Paul E. Geck is indebted to G. W. Wilkinson, in the sum of TWO HUNDRED EIGHTY FIVE AND 78/100 DOLLARS (\$285.78) plus court costs and interest, and that he has commenced on suit by summons and complaint on said indebtedness against the said Paul E. Geck, and that Scott Paper Company, Mobile, Alabama, 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 Scott Paper Company is necessary to obtain satisfaction of said claim; and that the said Scott Paper Company 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.



Sworn to and subscribed before me this  
25th day of May, 1965.

  
Clerk, Circuit Court of Baldwin County, Ala.

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19--

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Term, 19-- of the Circuit Court of Baldwin County,  
to-wit: On the 21st day of September, 1962, being a regular day of  
said term, G. W. WILKINSON

recovered judgment against PAUL E. GECK

for the sum of TWO HUNDRED EIGHTY FIVE and 78/100--- Dollars, and cost of suit,  
and affidavit having been made by J. Connor Owens, Jr.,  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

SCOTT PAPER COMPANY, MOBILE, ALABAMA

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant Paul E. Geck or that it is, or  
is believed to be indebted to said defendant Paul E. Geck or to be liable to them, or to one of them on a  
contract for the delivery of personal property, or on a contract for the payment of money which may be  
discharged by the delivery of personal property, or which is payable in personal property.

You Are Therefore Hereby Commanded to Summon Scott Paper Company

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House  
thereof, in the city of Bay Minette, within thirty (30) days from the service hereof  
of the garnishment, or at the time making its answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer it was indebted to said defendant  
Paul E. Geck and whether it will not be indebted in future to said defendant  
Paul E. Geck by a contract then existing, and whether by a contract then existing it  
is, or are, liable to said defendants 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 it has not in its possession or under its control money or  
effects belonging to the defendant Paul E. Geck

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 25th day of May, A.D., 1965

Issued 25th day of May A.D., 1965.

ATTEST:

EX-5-31-65

Alice J. Duck, Clerk.

*Inf*  
2828  
Circuit Court, Baldwin County

No. 5214 1/2

G. W. Wilkerson

VS. { Garnishment On Judgment

Paul E. Geck

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Mrs. Ann Aubrey Beall

Issued \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

J. Connor Owens  
Attorney

Printed by Moore Prg. Co.

Resolved 26 day of May 1965  
and on 31 day of May 1965  
I served a copy of the within Sam  
Scott Loper Co.

My service on Mrs. Aubrey  
Per Clerk  
Ray L. Bridges  
By W. E. Darnoff D. S.

BY \_\_\_\_\_  
MAY 27 9 59 AM '65  
REC'D. SHERIFF DEPT.  
BALDWIN COUNTY, ALA.



## RELEASE OF GARNISHMENT

Circuit Court of Baldwin County, Alabama

RE: G. W. WILKERSON  
vs. Plaintiff.

PAUL E. GECK  
Defendant.

To: SCOTT Paper Company, Mobile, Alabama  
GARNISHEE

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that in the above styled case, Garnishment has been released and Garnishee has been discharged.

Witness my hand, this the 2nd day of June, 1965

Alice J. Duck, CLERK.

5214/2  
State of Alabama

BALDWIN COUNTY

TO PAUL E. GECK, LOXLEY, ALABAMA, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

G. W. WILKINSON, Plaintiff,

versus PAUL E. GECK, Defendant,

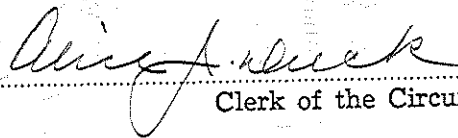
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

SCOTT PAPER COMPANY, MOBILE, ALABAMA

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 25th.

day of May, 1946.

  
Clerk of the Circuit Court.

62-5-38-65

5214 1/2

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

TAYLOR WILKINS, Sheriff

By W. O. Garner D. S.

Lorley

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY W. O. Garner  
DEPUTY SHERIFF

G. W. Wilkerson

Plaintiff.....

VS.

Paul E. Geck

Defendant.....

Lorley

J. Connor Owens  
Solicitor For P.H.