

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon W. J. RAYBORN, 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, Alabama, at the place of holding same by B. A. THOMAS, doing business as THOMAS SUPER SERVICE.

Witness my hand this the 10 day of August, 1961.

Alice J. Duck
Clerk

64-8-30-61

* * * * *

48B

COMPLAINT

B. A. THOMAS, doing business
as THOMAS SUPER SERVICE,

PLAINTIFF

VS:

W. J. RAYBORN,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant EIGHTY-EIGHT & 25/100 DOLLARS (\$88.25), due from him by account on, to wit: the 1st day of May, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant EIGHTY-EIGHT & 25/100 DOLLARS (\$88.25), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of May, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant EIGHTY-EIGHT & 25/100 DOLLARS (\$88.25), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of May, 1961, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 2nd day of August, 1961.

James C. Smith
Attorney for Plaintiff

The defendant's address is:

Silverhills, Alabama

FILED

AUG 10 1961

ALICE J. DUCK, CLERK
REGISTER

State of Alabama
BALDWIN COUNTY

TO W. J. RAYBORN Defendant.....

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

B. A. THOMAS, doing business as THOMAS SUPER SERVICE Plaintiff.....

versus W. J. RAYBORN Defendant.....

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

SCOTT BROTHERS CONSTRUCTION and JOE M. LAMBERT

have... been named as Garnishee S.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 10
day of August 1941...

Alice J. Cook
Clerk of the Circuit Court.

95 A

Clerk of the Circuit Court

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the said Court this 1st day of May, 1934.

SCOTT BROTHERS CORPORATION

Now pending in the Circuit Court of Baldwin County, Alabama, a certain cause to wit:

A. J. LARSEN

vs. SCOTT BROTHERS CORPORATION

and the heirs, assigns and assigns of the said

A. J. LARSEN

Defendant
Baldwin County
State of Alabama

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

Plaintiff.....

VS.

Defendant.....

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

B. A. THOMAS, doing business as
THOMAS SUPER SERVICE,

PLAINTIFF

VS-

W. J. RAYBORN,

DEFENDANT

SUMMONS AND COMPLAINT
AND
NOTICE OF GARNISHMENT

FILED
AUG 25 1964
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

RECEIVED IN OFFICE
This 30 day of Aug 1964
HENRY CLAY LOCKE, Sheriff
Washington County, Ala.

Francis D. S.

EXECUTED

This 31 day of Aug 1964
by serving a copy of the within
on W. J. Rayborn
HENRY CLAY LOCKE, Sheriff
Washington County, Ala.

William M. Smith D. S.

EXECUTED

By Serving a Copy of the Within

Summons & Complaint \$ 1.50

1 Miles @ .10.....\$.10

Total \$ 1.60

Signed: HENRY CLAY LOCKE, Sheriff

By Henry Clay Locke
Washington County, Ala.

By: Francis

Received 10 day of Aug 1964
and on day of 19
I served a copy of the within VC Notice
on W. J. Rayborn
By service on
TAYLOR WILKINS, Sheriff
By

The State of Alabama,

BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas B. A. THOMAS, doing business as THOMAS SUPER SERVICE
has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
of said County, against W. J. RAYBORN

for the sum of EIGHTY-EIGHT & 25/100 Dollars and whereas, the said

B. A. THOMAS

has entered into bond, and made affidavit as required by law that the said SCOTT
BROTHERS CONSTRUCTION in Alexander City, Alabama

is indebted to W. J. RAYBORN in the sum of EIGHTY-EIGHT & 25/100

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

SCOTT BROTHERS CONSTRUCTION

is believed to be Chargeable as garnishee in the cause.

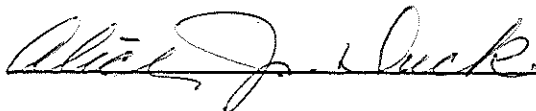
YOU ARE THEREFORE, commanded to summon the said

SCOTT BROTHERS CONSTRUCTION

to be and appear ~~at the~~ within 30 days term of the Circuit Court, to

be holden for the County of Baldwin, ~~at the~~ within 30 days, 1961,
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 10 day of August, 1961.



Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting :

Whereas, B. A. THOMAS, doing business as THOMAS SUPER SERVICE

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

County, against W. J. RAYBORN

for the sum of EIGHTY-EIGHT & 25/100 Dollars and whereas, the said

B. A. THOMAS

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

SCOTT BROTHERS CONSTRUCTION, i JOE M. LAMBERT, 735 Colerain, Fairhope,
Alabama

is indebted to W. J. RAYBORN in the sum of EIGHTY-EIGHT & 25/100

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 JOE M. LAMBERT

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said JOE M. LAMBERT

to be and appear ~~at the~~ within 30 days ~~before the Circuit Court~~, to

be holden for the County of Baldwin, on within 30 days 1961,
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 10 day of August, 1961

Alice J. Sucke
Clerk.

Received 10 day of Aug 1961
and on _____ day of _____ 19____
I served copy of the within Warrant
on Joe M. Lambert
By service on _____
TAYLOR WILKINS, Sheriff
By _____

RECORDED

No. 4813
Circuit Court of Baldwin County
B. A. Thomas d/b/a
Thomas Super Service
VS. } GARNISHMENT ON SUMMONS
W. J. Rayburn
Issued 10 day of Aug 1961
E. A. Christian
Plaintiff's Attorney

RECEIVED IN OFFICE
This 30 day of Aug 1961
HENRY CLAY LOCKE, Sheriff
Washington County, Ala.
Frances D. S.

EXECUTED
This 30 day of Aug 1961
by serving a copy of the within
on Joe Lambert
HENRY CLAY LOCKE, Sheriff
Washington County, Ala.
William M. J. D. S.

EXECUTED
By Serving a Copy of the Within
Summons copy \$ 1.50
1 Miles @ .10.....\$ 10
Total \$ 1.60
Signed: HENRY CLAY LOCKE, Sheriff
By Henry Clay Locke
Washington County, Ala.
Sheriff
By Frances

BOND

The State of Alabama, }
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, B. A. THOMAS and P. F. SCHULTZ

are held and firmly bound unto W. J. RAYBORN

in the sum of TWO HUNDRED & 00/100 DOLLARS,

to be paid to the said W. J. RAYBORN

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 3rd day of August, 1961

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

B. A. THOMAS

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

W. J. RAYBORN

the sum of EIGHTY-EIGHT & 25/100 Dollars,

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

SCOTT BROTHERS CONSTRUCTION and JOE M. LAMBERT

summoning ~~h. them~~ to answer what ~~they are~~ indebted to said Defendant, or what effects of said Defendant ~~they~~ have in ~~their~~ possession, or under ~~their~~ 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.

B A Thomas (Seal)

B. A. Thomas (Seal)

P. F. Schultz (Seal)

Approved this 10 day of August A. D., 1961

Alice J. Luck Clerk.

The State of Alabama
Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared B. A. THOMAS

who, being duly sworn, doth depose and sayS that W. J. RAYBORN

indebted to him in the sum of EIGHTY-EIGHT & 25/100 Dollars,
and that he haS commenced on suit by summons and complaint on said indebtedness
against the said W. J. RAYBORN

and that SCOTT BROTHERS CONSTRUCTION and JOE M. LAMBERT

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in their
possession, or under their control, and that he believe that process of Garnishment against the said
W. J. RAYBORN

is necessary to obtain satisfaction of said claim; and that the said SCOTT BROTHERS CONSTRUCTION
and JOE M. LAMBERT
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 August day of 1951

Janice L. Childress NOTARY PUBLIC
JANICE L. CHILDRESS, Notary Public
Baldwin County, Alabama
My Commission Expires 7/13/61

116

No. 41163

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT

Plaintiff

TO

Defendant

Bond and Affidavit in Garnishment
on Summons

Filed this _____ day of _____, 19____

Clerk.

Printed by Moore Pig. Co.

RELEASE OF GARNISHMENT

CIRCUIT Court of BALDWIN County, Alabama

RE: B. A. THOMAS, d/b/a THOMAS SUPER SERVICE
vs. Plaintiff.

W. J. RAYBORN

Defendant.

To: ELROY MCKENZIE
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 28 day of August, 19 62

Alice J. Duck, CLERK.

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 October Term, 1961, of the Circuit Court of Baldwin County,
to-wit: On the 6th day of October, 1961, being a regular day of
said term, B. A. THOMAS, d/b/a THOMAS SUPER SERVICE,
recovered judgment against W. J. Rayborn

for the sum of Ninety and 25/100 (\$90.25) Dollars, and cost of suit,
and affidavit having been made by Forest A. Christian
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

Elroy McKenzie, Fairhope, Alabama

has or is believed to have in his possession, or under his control money
or effects belonging to said defendant W. J. Rayborn or that he is, or
is believed to be indebted to said defendant W. J. Rayborn 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 Elroy McKenzie,
Fairhope, Alabama,

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House
within 30 days
thereof, in the city of Bay Minette, on the Monday in July, A. D. 1962,
then and there within the three first days of the term, to answer on oath, whether at the time of the service
of the garnishment, or at the time making his answer, or at any time intervening the time of serv-
ing the garnishment, and making the answer he was indebted to said defendant
is and whether he will not be indebted in future to said defendant
by a contract then existing, and whether by a contract then existing
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 he has or has not in his possession or under his control money or
effects belonging to the defendant W. J. Rayborn

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

Witness, ALICE J. DUCK, Clerk of said Court, this 24th day of July, A. D., 1962.

Issued 24th day of July, A. D., 1962.

ATTEST:

Alice J. Duck, Clerk.

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County Forest A. Christian, who being duly sworn, deposes and saith that B. A. THOMAS, d/b/a THOMAS SUPER SERVICE, at the October 6 term, A. D., 1961, in the Circuit Court of Baldwin County recovered a judgment against W. J. Rayborn for the sum of \$90.25 and the further sum of dollars cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment and that Elroy McKenzie has or is believed to have in his possession or under his control, money or effects belonging to the defendant, or that he has or is believed to be indebted to the defendant, or is to be liable to him 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.

Forest A. Christian
Forest A. Christian

Sworn to and subscribed before me this 24th day of July, 1962.

Alice J. Duck
Alice J. Duck

Clerk of the Circuit Court of
Baldwin County.

ORIGINAL

Circuit Court, Baldwin County

No. 4813 1/2

B. A. Thomas

VS. } Garnishment On Judgment

W. J. Rayborn

Issued day of 19--

Returnable day of 19--

Attorney

Printed by Moore Pig. Co.

Received 24 day of July 1962

and on 3 day of August 1962

I served a copy of the within judgment

on Elroy McKenzie

By service on Barnwell

TAYLOR WILKINS, Sheriff

By Taylor Wilkins

90 90.25 miles at

Sheriff claims 90.25

Ten Cents per mile Total \$ 9.00

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins

DEPUTY SHERIFF

State of Alabama

BALDWIN COUNTY

TO W.J. RABON, Defendant:

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

B.A. THOMAS

Plaintiff,

versus W.J. RABON, Defendant,

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

Elroy McKenzie, Fairhope

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 24th

day of July, 1942

Alice J. Luck
Clerk of the Circuit Court.

4813 1/2 Original
ORIGINAL
NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

W. J. RAYBORN

B. A. THOMAS, d/b/a

Plaintiff

VS.

W. J. RAYBORN

Defendant

F. A. Christian
Attorney

Received 24 day of July 1948
and on 31 day of July 1948

I served a copy of the within Nature
on W. J. Rayborn

By service on Bannwick

TAYLOR WILKINS, Sheriff

By Taylor Wilkins

Sheriff claims 9.00 miles at
Ten Cents per mile Total \$ 9.00
TAYLOR WILKINS, Sheriff
Deputy Sheriff