

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOE M. LAMBERT, 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 P. F. SCHULTZ, DISTRIBUTOR OF STANDARD OIL PRODUCTS.

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

Ex 8-30-61
* * * * *

Alice J. Duck
Clerk

COMPLAINT

P. F. SCHULTZ, DISTRIBUTOR OF
STANDARD OIL PRODUCTS,

PLAINTIFF

VS:

JOE M. LAMBERT,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED NINETY-FIVE & 03/100 DOLLARS (\$195.03), due from him by account on, to wit: the 1st day of April, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED NINETY-FIVE & 03/100 DOLLARS (\$195.03), due from him on account stated between the plaintiff and the defendant on, to wit: the 1st day of April, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED NINETY-FIVE & 03/100 DOLLARS (\$195.03), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 1st day of April, 1960, 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 3rd day of August, 1961.

Paul C. Cline
Attorney for Plaintiff

The defendant's address is:
735 Colerain
Fairhope, Alabama

FILED

AUG 10 1961

ALICE J. DUCK, CLERK
REGISTER

101

8-1-61

P. F. SCHULTZ

DISTRIBUTOR

M. Joe M. Lambert

743 Calumet Ave. Lanham, Md.

STANDARD OIL PRODUCTS

1960

FORMER ITEMIZED STATEMENT

		Balance carried		
		from January 60	3890	
Feb	6	59186	1205	
		59226	2293	
		59363	1948	
		59423	1964	
Mar	1	59397	1964	
		59480	1080	
		59550	884	
	22	59670	720	
		59691	1604	
		87709	720	
April	8	87603	1321	19593

I certify that the above bill is correct and unpaid according to the best of my knowledge.

Sworn to and subscribed before me this 3rd day of August, 1961.

James R. Childers
Notary Public
Baldwin County, Alabama

Paul Schultz, Agent
Standard Oil Company

State of Alabama

BALDWIN COUNTY

TO JOE M. LAMBERT, Defendant.....

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

P. F. SCHULTZ, DISTRIBUTOR OF STANDARD OIL PRODUCTS, Plaintiff.....versus JOE M. LAMBERT, Defendant.....

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

SCOTT BROTHERS CONSTRUCTION

has..... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 10.....day of August, 19461.Alice J. [Signature]
Clerk of the Circuit Court.

1015

CLERK OF THE CIRCUIT COURT

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT IN AND FOR THE COUNTY OF BALDWIN, ALABAMA

VS.

Plaintiff

VS.

Defendant

**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

P. F. SCHULTZ, DISTRIBUTOR OF
STANDARD OIL PRODUCTS,
PLAINTIFF

--VS--

JOE M. LAMBERT,
DEFENDANT

SUMMONS AND COMPLAINT
AND
NOTICE OF GARNISHMENT

FILED

AUG 10 1961

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

RECEIVED IN OFFICE

This 30 day of Aug 1961
HENRY CLAY LOCKE, Sheriff
Washington County, Ala.

Graces D. S.

EXECUTED

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

William M. Smith D. S.

EXECUTED

By Serving a Copy of the Within:

Sub. C. \$ 1.50

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

Total \$ 1.60

Signed: HENRY CLAY LOCKE, Sheriff

By Henry Clay Locke
Washington County, Ala.

Received 10 day of Aug 1961
and on 10 day of Aug 1961
I served a copy of the within Notice
on Joe M. Lambert
By service on Taylor Wilkins, Sheriff
By Taylor Wilkins, Sheriff D. S.

The State of Alabama,

BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas P. F. SCHULTZ, DISTRIBUTOR OF STANDARD OIL PRODUCTS
has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
of said County, against JOE M. LAMBERT

for the sum of ONE HUNDRED NINETY-FIVE & 03/100 Dollars and whereas, the said
P. F. SCHULTZ

has entered into bond, and made affidavit as required by law that the said
SCOTT BROTHERS CONSTRUCTION of Alexander City, Alabama
is indebted to JOE M. LAMBERT in the sum of ONE HUNDRED NINETY-FIVE & 03/100
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, 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.

Miss J. Duck

Clerk.

No. 4514

**Circuit Court Of
Baldwin County**

*P. F. Schultz,
Distributor of Standard
Oil Products*

vs. } **Garnishment On Summons**

Joe M. Lambert

Issued 10 day of Aug., 1961

F. A. Christian
Plaintiff's Attorney.

Printed By The Baldwin Times

Received 10 day of Aug 1961

and on _____ day of _____ 19____

served a copy of the within _____

Seattle Const. Co.

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Executed within by serving a copy of
This 17 day of Aug, 1961
W. H. Boones Sheriff
W. F. A. Pich D. Sheriff

effects pertaining to the defendant
between himself and the plaintiff and the same are in the possession of the defendant and the plaintiff is
thereby notified that he is hereby notified by the plaintiff of the garnishment on which is being in
this captioned and are liable to him for the payment of the same and the plaintiff is hereby notified that
will not be permitted to him in the future by a contract of payment and the plaintiff is hereby notified that
garnishment and making the same and the plaintiff is hereby notified that the defendant and the plaintiff are
at the time of making the same and the plaintiff is hereby notified that the defendant and the plaintiff are
and there is a contract of payment and the plaintiff is hereby notified that the defendant and the plaintiff are
to be paid within the time of the same and the plaintiff is hereby notified that the defendant and the plaintiff are

YOU ARE HEREBY COMMANDED TO RETURN THE SAME

to be returned to the plaintiff or to the court in the case

Copy

BOND

The State of Alabama, }
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

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

are held and firmly bound unto JOE M. LAMBERT

in the sum of FOUR HUNDRED & 00/100 DOLLARS,
to be paid to the said

JOE M. LAMBERT

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
P. F. SCHULTZ

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

the sum of ONE HUNDRED NINETY-FIVE & 03/100 Dollars,
and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

SCOTT BROTHERS CONSTRUCTION

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.

P. F. Schultz (Seal)

B. A. Thomas (Seal)

B. A. Thomas (Seal)

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

Alice J. Lusk Clerk.

The State of Alabama

Baldwin County

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

in and for said County, personally appeared P. F. SCHULTZ

who, being duly sworn, doth depose and say that

JOE M. LAMBERT

indebted to him in the sum of ONE HUNDRED NINETY-FIVE & 03/100 Dollars,
and that he has commenced on suit by summons and complaint on said indebtedness
against the said JOE M. LAMBERT

and that

SCOTT BROTHERS CONSTRUCTION

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 it believe that process of Garnishment against the said

SCOTT BROTHERS CONSTRUCTION

is necessary to obtain satisfaction of said claim; and that the said SCOTT BROTHERS CONSTRUCTION
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 19 61

Janice L. Childress, Clerk Circuit Court.

JANICE L. CHILDRESS, Notary Public
Baldwin County, Alabama
My Commission Expires 7/11/65

116

No. 4844

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 Prg. Co.