#### 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 hiding same by P. F. SCHULTZ, DISTRIBUTOR OF STANDARD OIL PRODUCTS.

#### COUNT I:

The plaintiff claims of the defendant ONE HUNDRED TWENTY-NINE & 22/100 DOLLARS (\$129.22), 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 ONE HUNDRED TWENTY-NINE & 22/100 DOLLARS (\$129.22), 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 ONE HUNDRED TWENTY-NINE & 22/100 DOLLARS (\$129.22), 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.

The defendant's address is: Silverhill, Alabama

Attorney for Plaintiff

FOLEY, ALABAMA, -

TO HE OD IN OUT OF SHEER

	STANDARD OIL PROP	DUCTS	
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	I certify that the a correct and unpaid.	bove bill	is
Sworn to a before me of August,	this 2nd day	chustz Ag	ent any

Notary Rublic Baldwin County, Alabama

JANICE A CHILL STON Notary Public Baldwin County, Alabama My Commission Expires 7/13/65

State of Alabama  BALDWIN COUNTY	Garnishment has been issued in the case of
TO W. J. RAYBORN	Defendant ::
YOU ARE HEREBY NOTIFIED that a Writ of	Garnishment has been issued in the case of
P. F. SCHULTZ, DISTRIBUT	OR OF STANDARD OIL PRODUCȚSplaintiff ,
versus W. J. RAYBORN	Defendant
now pending in the Circuit Court of Baldwin County,	
SCOTT BROTHERS CONSTRUCTION	and JOE M. LAMBERT
have been named as Garnishees	
IN WITNESS WHEREOF, I have hereunto set	my hand and affixed my seal on this the
day of August , 1941.	Alcci, Suck, Clerk of the Circuit Court.

TO DEFENDANT OF GARNISHMENT

 $\mathbf{B}\mathbf{Y}$ 

CLERK OF CIRCUIT COURT BALDWIN COUNTY, ALABAMA

TO

\$500 X.C.

CINIOD SHORE

Plaintiff.....

VS.

Defendant.

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d onday ofderived a copy of the within a copy of the copy of the within a copy of the copy of the within a copy of the copy of t	P. F. SCHULTZ, DISTRIBUTOR GETANDARD OIL PRODUCTS,
	PLAINTIF)
y service on	-vs-
TAYLOR WILKINS, Sheriff D. S.	W. J. RAYBORN  DEFENDAN
	SUMMONS AND COMPLAINT AND NOTICE OF GARNISHMENT

OF

This SO day of Lacy 196/ HENRY CLAY LOCKE, Sheriff Washington County, Ala. Success of B EXECUTED This <u>SO</u> day of <u>lecco</u> 19<u>6/</u> by serving a copy of the within on I G. Reylorne HENRY CLAY LOCKE, Sheriff Washington County, Ala, EXECUTED By Serving a Copy of the Withih \_\_Miles @ .10.....\$\_\_\_ Total \$ 1,60 Signed: HENRY CLAY LOCKE, Sheriff Washington County, Na.

By: Incomeed

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA

#### CIRCUIT COURT

### BYTDMIN COUNTY THE STATE OF ALABAMA,

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							VI - 21.61	s Attorney

RECEIVED IN OFFICE
This 30 day of aug 1961 HENRY CLAY LOCKE, Sheriff
Washington County, Ala.
Silcucces D. S.
EXECUTED
This 30 day of 6 - 106/

by serving a copy of the within HENRY CLAY LOCKE, Sheriff Washington County, Ala.

EXECUTED By Serving a Copy of the Within \_Miles @ .10.....\$\_\_\_\_ Signed: HENRY CLAY LOCKE, Sheriff
By Washington County Ala.

## THE STATE OF ALABAMA, BALDWIN COUNTY

#### CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas,	P.F. SCHULTZ	, DISTRIBUT	OR OF STANDAR	D OIL PRODUCT	.s
has commenced suit	by Summons and Co	omplaint returnabl	le to the next term of	the Circuit Court	of said
Berandaria da baran e e e		unter generalisme			e e e e e e e e e e e e e e e e e e e
County, against	W. J. RA	YBORN			
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for the sum of <u>UN</u>	E HUNDRED TWEI	NIX-NINE &	22/100I	ollars and whereas,	the said
to elektrica Tarak	ivla III. P. 1	F. SCHULTZ			
	Marian Marian Marian Marian	-			
A State of the Sta	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
	Comments Comments			7 AMERICA AMERICA A	
has entered into bon	d, and made affidavit	as required by la	w that the said $\underline{S}$	JOIN BROTHERS	
CONSTRUCTION	in Alexander	City, Alab	ama		
	15 mg. 15 mg. 15 mg.				
is indebted to W.	J. RAYBORN	in the sum of	ONE HUNDRE	O TWENTY-NINE	<u>&amp; 22/100</u>
Dollars and that no	ocess of garnishment	is baliared to be	lecessary to obtain a	tisfaction of such in	
Donars, and that pro-	eess of garmsnment	is believed to be i	recessary to obtain sa	distaction of such ju	.agment
as may be recovered	by Plaintiff, and the	t SCOTT BI	ROTHERS CONSTI	RUCTION	en ann ang an aithrea ann ann ann an ann an Araigh Annang an an
		is believed to	be chargeable as gari	nichoo in the serve	
	*	is believed to	be chargeante as gar	nshee in the cause.	
YOU ARE T	HEREFORE, comm	anded to summo	the said SCOTT	BROTHERS CON	STRUCTION
			TATE SILICE		
•					
to	be and appear XXXX	within 30	days x	MYNYHKEHMYK	ŽUKUK to
					•
be holden for the Co	ounty of Baldwin, on	<u> </u>	30 days		19,
then and there to an	swer, upon oath, who	ether, at the time	of the service of the	is garnishment, or	at the
time of making your	answer, or at any time	me intervening be	tween the time of ser	ving the garnishme	ent and
making the answer,	you were indebted to	the defendant, as	nd whether, you will	not be indebted to	him in
the future by a cont	ract then èxisting, ar	nd whether by a c	ontract then existing	, you are liable to	him for
the delivery of perso	nal property, or for t	he payment of mo	oney which may be d	ischarged by the del	ivery of
personal property, o	r which is payable in	personal property	, and whether you l	ave not in your pos	ssession
or under your contro	ol money or effects be	longing to the de	fendant.		
Witness my l	and this / Erd	day of	August		1961
-					,
		/ /		- //	ń

TAYLOR WILKINS, Sheriff

No. 4815 Circuit Court of Baldwin County Pot Schultz, Distributer & Products and led

> 1 : ( ) ( )

Plaintiff's Attorney

LAW OFFICE OF

#### FOREST A. CHRISTIAN

FOLEY, ALABAMA

October 5, 1961

Honorable H. M. Hall Judge of Circuit Court Bay Minette, Alabama

> Re: P. F. Schultz vs: Joe M. Lambert Case No. 4814

Dear Judge Hall:

Kindly enter a judgment in this case in the amount of \$213.03, based on an itemized, verified statement of account.

Also, please render a judgment for the same amount against Scott Brothers Construction Co., on a guarnishment, which was issued pending suit.

I understand that Mrs. Duck has a check from Scott Brothers to pay off this judgment, but we will need a judgment here so we can use the check.

With best wishes, I am

Cordially yours

forëst a./christian

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 untoWe_JRAYBORN
in the sum ofTWO HUNDRED SIXTY & 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 our selves, 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 this3rdday ofAugust, 19_6]
THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound
P. E. SCHULTZ
ha S 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 ONE HUNDRED TWENTY-NINE & 22/100 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 hithem 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 Plaintiffshall prosecute the Garnishment to effect, and pay the Defendant all
such costs and damages as hemay 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, andWe hereby severally
certify thatWe have property free from all incumbrance, to the full amount of the
above bond.
P.F. Schwltz (Seal)
B.A. Thomas (Seal)
Bahana (Seal)
Approved thisday ofAugustA.D., 1961_
alliel Don Duck Clerk.

The	State Baldwin		Alabama <sup>unty</sup>					CK, Cle	rk of Circ	uit Court,
in and	for said Co	ounty,	personally app	eared_	P. F	'. SC	HULTZ			
who, b	eing duly	sworn,	doth depose	and	sayS that					· ·
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The State of Alabama, & CIRCUIT COURT, BALDWIN COUNTY
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 the6thday ofOctober, 19.61_, being a regular day of
said term, P. F. Schultz, Distributor of Standard Oil Products,
recovered judgment against W. J. Rayborn
for the sum of One Hundred Thirty Five &00/100 (\$135.00) pollars, 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 inhispossession, or underhiscontrol money
or effects belonging to said defendant W. J. Rayborn or that be is, or
is believed to be indebted to said defendant W. J. Raybosp 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 theMonday inA. D. 19.62_,
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_DLSanswer, or at any time intervening the time of serv-
ing the garnishment, and making the answer he was indebted to said defendant
isand whetherwill not be indebted in future to said defendant
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 24thday ofJuly, A.D., 1962_
Issued 24th day of July A. D., 19 62.
ATTEST:
Ulice - Duck , Clerk.

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 Paul F. Schultz at the October 6, 1961 term, A. D., 1961, in the Circuit Court of Baldwin County recovered a judgment against W. J. Rayborn for the sum of \$135.00 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

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

Alice J. Duck
Clerk of the Circuit Court of
Baldwin County.

Sircuit Court, Baldwin County

No. 48 W. C.

Sarnishment On Judgment

etitimable day of 19

Attorney

Printed by Moore Pig. Co.

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I served a copy of the within Hay on Hay service on Traylor WILKINS, Sheuff

Sheriff claims

Sheriff claims

Sheriff (By 1962)

Sheriff (B

State of Alabam BALDWIN COUNTY	α }	ora Majarika Kondok og			
TO		7, 20 de 1,	, Defendant		10
YOU ARE HEREBY	NOTIFIED that a Z, Distributor				
versus W.J. RAYBORN		200 juli			ens.
now pending in the Circuit  ELROY McKENZ	Court of Baldwin	· · · · · · · · · · · · · · · · · · ·	a, Law Side, ir	n which	
has been named as Garnis	hee				
IN WITNESS WHER		(2.)#	d and affixed n	ny seal on th	is the 24th
day of July				0 6	

Alice Suck Clerk of the Circuit Court.

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NOTICE	
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W.J. RAYBORN	MATERIAL PROPERTY.
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P.F. SCHULTZ, Distributor of Standard Qil Products Plaintiff	8
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W.J. RAYBORN	And Attended
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- 19 A B A A A A A A A A A A A A A A A A A	
Defendant	
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Sheriff claims

Ten Cents per mile Total s

TAYLOR WILKING Sheriff

By

DEPUTY SHERIFF

\_day of\_

Received-

F.A. Christian Attorney

ns-4815/12

	Cot	ırt ot		County	, Alabama
RE:	P. F. SCHULT	Z, Distributor	s of STANDAR	D OIL PRODUCTS	
			vs.		Plaintiff.
<u>M</u> . J	. RAYBORN				
·					Defendant.
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ALIC	e j. duck	Clerk of the	Circuit	Court of Bal	dwinCounty,
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