

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Edna Anderson to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same then and there to answer the complaint of Jack Boykin.

Witness my hand this 12 day of September, 1961.

Alice J. Duck
Clerk

JACK BOYKIN,

Plaintiff,

vs.

EDNA ANDERSON,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4863

The Plaintiff claims of the Defendant \$500.00 due on a Promissory Note executed by the Defendant and endorsed by the Plaintiff, and said note not having been paid as required in and by its terms, the Plaintiff was required to pay the same and the same has been assigned to him and is now due and payable in full, which sum of money, with the interest thereon is still unpaid.

CHASON & STONE

By:

Melvin P. Stone Jr.
Attorneys for Plaintiff

Defendant resides at Fort Morgan, Alabama

FILED

There is filed herewith an affidavit of attachment and a bond.

SEP 12 1961

ALICE J. DUCK, CLERK
REGISTER

Executed Sept 12, 1961
Serving copy of within Summons & Complaint on

Edna Anderson

James Wilkins Sheriff
Deputy Sheriff

St. Mary's

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF

JACK BOYKIN,
Plaintiff,

VS.

EDNA ANDERSON,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED

SEP 12 1961

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Jack Boykin hath complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that Edna Anderson is justly indebted to Jack Boykin in the sum of \$500.00 due on a Promissory Note executed by the Defendant and endorsed by the Plaintiff and said note not having been paid as required in and by its terms the Plaintiff was required to pay the same and the same has been assigned and is now due and payable in full, and the Plaintiff having made affidavit and given bond as required by law in such cases, YOU ARE HEREBY COMMANDED to attach so much of the Estate of Edna Anderson as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings therein to be had in the Circuit Court of Baldwin County, Alabama, to be held at the courthouse thereof; when and where you must make known how you have executed this writ.

Witness my hand and seal this the 12 day of September, 1961.

Alice J. Duck
Clerk

Executed, Sept 12, 1961

By taking in possession and looking after Horse # 10
At Fort Morgan, Ala. The Following Property

Jaylen Wilkins Sheriff

Fort Morgan, Alabama

1 set of pillows; 1, 9x12 rug; 2, Pillows;

1, Oak Clock; 2, sheets of plywood; 2, Bookcases & Books

1, Couch; 1 set of what was; 4, tables; 1, Served glass

1, Magic Chief gun range; 1, metal cabinet,

1, Deep freeze; 1, set of mixed dishes; 1, set of bed linen;

1, Clock; 1, Mirror; 2, Pictures; 2, Hollywood bed,

1, white sewing machine; 1, pitcher & bowl; 1, Bench chair.

and desk; 1, roll of nylon rope; 3, gas heaters; 3, rocking chairs;

1, Bath tub; 3, Drapes; 7, Chairs; 1, Chest of drawers;

1, Hermit Chair; 1, ottoman bed; 1, gel paint.

224, Straight Chairs; 4, Rocking Chairs;

4, Green rocking Chairs; 2, Lazy Rovers

1, poker table; 1, National Cash register

2, Small rockers; 1, Chest of drawers

1, Model A, Ford; 1, Sofa; 2 chairs,

Sheriff claims 140 miles at

Ten Cents per mile Total \$ 14.00

TAYLOR WILKINS, Sheriff

BY

CC
DEPUTY SHERIFF

The State of Alabama, Mobile, County:

CASE NO. _____

Personally appeared before John E. Mandeville, Clerk of the Circuit Court of said County
 Jack Boykin

who maketh oath and sayeth that Edna Anderson

is _____ justly indebted to Jack Boykin

in the sum of \$500.00

_____ Dollars and that said

Edna Anderson is about to remove from the State of Alabama

so that the ordinary process of law cannot be served upon him, and that an attachment is not sued
 out for the purpose of vexing or harrassing him, the said Edna Anderson

Sworn to and subscribed the 11

day of Sept 19 61, before me

John E. Mandeville
 Clerk.

(ATTACHMENT BOND)

KNOW ALL MEN BY THESE PRESENTS, That we Jack Boykin and

National Union Fire Insurance Company

of the County of Mobile are held and firmly bound unto

Edna Anderson

in the sum of \$1,000.00

_____ Dollars, to be paid to the said

Edna Anderson

his certain Attorneys, Executors, Administrators or Assigns, for which payment, well and truly to be
 made, we bind ourselves and our heirs, executors or administrators, jointly and severally, firmly
 by these presents. Sealed with our seals, and dated the 11th day of September
 in the year of Our Lord, one thousand, nine hundred and sixty-one

The Condition of the above Obligation is such, That whereas the above bounden

Jack Boykin

_____ hath the day of the

date hereof, before the Clerk of the Circuit Court of Mobile County, prayed an Attachment at the
 suit of Jack Boykin against the estate of the above named

for the sum of \$500.00

_____ Dollars and hath obtained the same

returnable to the present term of the Circuit Court of Mobile County.

Now, if the said Jack Boykin

Shall prosecute

Attachment to effect, and pay to the said Edna Anderson

all such damages _____ which she _____ may sustain by the wrongful or vexatious
 suing out thereof, then the above obligation to be void, otherwise to remain in full force and effect.

IN PRESENCE OF

Cynthia H. Burden

Jack Boykin (Seal)

Robert H. Robertson

National Union Fire Insurance Co. (Seal)

Filed Sept 12, 1961

By: M. Garland Lee (Seal)
 Attorney-in-Fact

Approved: Miss J. J. Clark, Clerk

POWER OF ATTORNEY

(Certified Copy)

NATIONAL UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA.

KNOW ALL MEN BY THESE PRESENTS:

That National Union Fire Insurance Company of Pittsburgh, Pa., a corporation of the Commonwealth of Pennsylvania, pursuant to authority granted by resolution duly passed by the Board of Directors of said Company at a meeting of that body, at which a quorum was present, held on the 26th day of September, 1950 in the City of Pittsburgh, Commonwealth of Pennsylvania, which resolution is still in effect and reads as follows:

"RESOLVED, that the President, any Vice President, a Secretary, or an Assistant Secretary, may, from time to time appoint Attorneys-in-fact to represent and act for and on behalf of the Company to execute bonds, undertakings, recognizances and other contracts of suretyship and indemnity, including agreements of co-suretyship and reinsurance, and to attach thereto the corporate seal of the Company, in the transaction of its fidelity and surety business, and may at any time remove any such Attorney-in-fact and revoke any such power of attorney and authority given to any such Attorney-in-fact."

does hereby nominate, constitute and appoint M. HARLAND ISON,

of Mobile, Alabama

its true and lawful Agent(s) and Attorney(s)-in-fact to make, execute, seal and deliver for and on its behalf, as surety, and as its act and deed, bonds, undertakings, recognizances and other contracts of suretyship and indemnity, including agreements of co-suretyship and reinsurance, as follows:

Any and all bonds, undertakings, recognizances and other contracts of suretyship and indemnity not exceeding the amount of FIFTY THOUSAND and 00/100 (\$50,000.00) DOLLARS in any single instance.

And when such bonds or undertakings shall have been duly executed pursuant hereto and the corporate seal affixed, they shall be as binding upon said Company, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the duly elected officers of the Company in their own proper persons.

IN WITNESS WHEREOF, National Union Fire Insurance Company of Pittsburgh, Pa., has caused these presents to be executed in its name and on its behalf and its Corporate Seal to be hereto affixed by

its duly authorized officer, this 27th day of February,

19 61

(Corporate Seal)

NATIONAL UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA.

By G. H. Collins,
Assistant Secretary

COMMONWEALTH OF PENNSYLVANIA } ss:
COUNTY OF ALLEGHENY

On this 27th day of February, A. D., 19 61, before the subscriber, a Notary Public in and for the State and County, aforesaid, duly commissioned and qualified, came G. H. Collins, Assistant Secretary of National Union Fire Insurance Company of Pittsburgh, Pa., to me personally known and known to be the officer described in, and who executed the preceding instrument, and acknowledged the execution of the same; and, being by me duly sworn, deposed and said that he is the said officer of the Company aforesaid, that the Seal affixed to the preceding instrument is the Corporate Seal of said Corporation, and that said Corporate Seal and his signature as such officer were duly affixed and subscribed to said instrument by the authority and direction of the said Company.

IN WITNESS WHEREOF, I have hereto set my hand and affixed my Notarial Seal, at Pittsburgh, County of Allegheny, the day and year first above written.

(Notarial Seal)

KATHRYN W. FREY
Notary Public

My Commission expires February 8, 1965.

(OVER)

NUFS 1001F

of Pittsburgh, Pa.

CERTIFICATE

I, T. G. Wells, Secretary of National Union Fire Insurance Company of Pittsburgh, Pa., do hereby certify that I have compared the foregoing copy of the Power of Attorney with the original now on file among the records of the Home Office of the Company, that the same is a full, true and correct copy, and that said Power of Attorney has not been revoked, amended or abridged, and is now in full force and effect.

Given under my hand and the Seal of the Company, at Pittsburgh, Pa., this 11th day of September, A. D., 19 61.



T. G. Wells

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Jack Boykin hath complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that Edna Anderson is justly indebted to Jack Boykin in the sum of \$500.00 due on a Promissory Note executed by the Defendant and endorsed by the Plaintiff and said note not having been paid as required in and by its terms the Plaintiff was required to pay the same and the same has been assigned and is now due and payable in full, and the Plaintiff having made affidavit and given bond as required by law in such cases, YOU ARE HEREBY COMMANDED to attach so much of the Estate of Edna Anderson as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings therein to be had in the Circuit Court of Baldwin County, Alabama, to be held at the courthouse thereof; when and where you must make known how you have executed this writ.

Witness my hand and seal this the 17 day of September, 1961.



Clerk

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County in said State, personally appeared Jack Boykin, who is known to me and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That he is the Plaintiff in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, wherein Jack Boykin is the Plaintiff and Edna Anderson is the Plaintiff. That the Defendant in said cause is indebted to the Plaintiff in the amount of \$500.00 due on a Promissory Note executed by the Defendant and endorsed by the Plaintiff, and said note not having been paid as required in and by its terms, the Plaintiff was required to pay the same and the same has been assigned to him and is now due and payable in full, which sum of money, with the interest thereon is still unpaid. That the Defendant is about to remove out of the State and is about to remove her property out of the State so that the Plaintiff will probably lose his debt or have to sue for it in another State. That the attachment is now sued out for the purpose of vexing or harassing the Defendant.


Jack Boykin

Sworn to and subscribed before me on this
the 12th day of September, 1961.


Notary Public, Baldwin County, Alabama