

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

Before me, J. Connor Owens, Jr., a Notary Public in and for said County, personally appeared Ray C. Stephens who being by me duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL BANK OF BAY MINETTE, ALABAMA filed in said Court, to-wit: 1955 Ford 4-Dr Sedan Sr. No. EBP-6015-E One John Deere Tractor complete with equipment belongs to FIRST NATIONAL BANK OF BAY MINETTE, the plaintiff.

Sworn to and subscribed before me this 3

day of April, 19 61

J. Connor Owens, Jr.
Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, FIRST NATIONAL BANK OF BAY MINETTE, a national banking association, Principal, and Ray C. Stephens and W.M. Kelly, Sureties, are held and firmly bound unto W.C. STANFORD, his heirs, executors and administrators in the sum of Twenty-Five and No/100 (\$25.00) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the _____ day of November, 19 61

The condition of the above obligation is such that whereas, the above bound FIRST NATIONAL BANK OF BAY MINETTE, a national banking association has on the _____ day of November, 19 61 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said W.C. STANFORD for the recovery of the following described property, to-wit:

1955 Ford 4-Dr Sedan Sr. No. EBP-6015-E

One John Deere Tractor complete with equipment

Now, if the said First National Bank of Bay Minette shall fail in said suit and shall pay to the said W.C. Stanford, the defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to be void, otherwise, to remain in full force and effect. FIRST NATIONAL BANK OF BAY MINETTE, a national banking association,

Taken and approved this _____ day of _____ BY: Ray C. Stephens (SEAL)
November, 19 61. Ray C. Stephens (SEAL)

W.C. Stanford
Clerk, Circuit Court

W.C. Stanford (SEAL)

No. 4932

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff

vs.

W.C. STANFORD

Defendant

Detinue — Affidavit and Bond

Filed this 3 day of NOV, 1961

ALICE J. LOCK, CLERK

Clerk

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

PLAINTIFF,

VS.

W.C. STANFORD,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW

NO. 4932

Now comes the Plaintiff, by its attorney, and amends its
complaint heretofore filed in this cause by adding the
following count:

COUNT II

The Plaintiff claims of the Defendant \$167.83 due by
promissory note made by him on the 19th day of July, 1960
and payable in six (6) installments of \$52.75 each, the
first installment due August 19th, 1960, with interest
thereon.

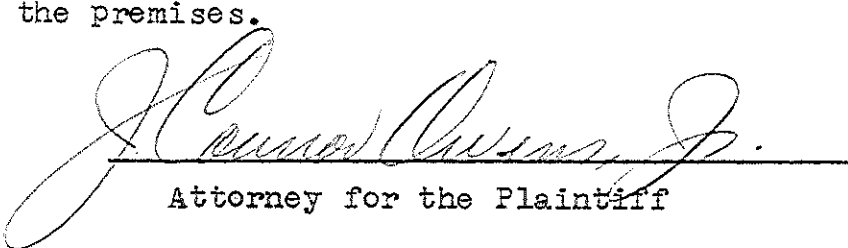
The Plaintiff alleges that in and by said note, the
Defendant waived all rights of exemption under the Laws of the
State of Alabama, and the Plaintiff claims the benefit of
said waiver.

Plaintiff further alleges that in and by the terms of said
note, the Defendant agreed to pay all costs of collection,
including a reasonable attorney's fee and Plaintiff claims
the further and additional sum of \$35.00 as a reasonable
attorney's fee in the premises.

FILED

MAY 16 1962

ALICE J. DUCK, CLERK
REGISTER


Attorney for the Plaintiff

5217

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW NO. 4932

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

PLAINTIFF

VS.

W.C. STANFORD,

DEFENDANT.

AMENDED COMPLAINT

FILED

MAY 16 1962

ALICE J. DUCK, CLERK
REGISTER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahlberg Building

BAY MINETTE, ALABAMA

Received 5-16-62

Received 16th day of May 1962
d on 20th day of June 1962
served a copy of the within
on W.C. Stanford

by service on

TAYLOR WILKINS, Sheriff
By Fred Schuch D. S.

Sheriff claims 4.4 miles at
Ten Cents per mile Total \$ 440
TAYLOR WILKINS, Sheriff
BY Deiter
DEPUTY SHERIFF

RETURNED 5-23-62
Not found in my County after diligent
search for the County.
RAY D. MCCOY, CLERK
By B. F. Harris D. S.

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

No. _____

NOVEMBER, 1961

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon W.C. STANFORD

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 the same, then and there to answer the complaint of _____

FIRST NATIONAL BANK OF BAY MINETTE, ALABAMA, a national banking association,

Witness my hand this 3 day of November, 1961.

Dee J. Luck, Clerk.

COMPLAINT

FIRST NATIONAL BANK OF BAY MINETTE, a national banking association

W.C. STANFORD

Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

1955 Ford 4-Dr Sedan Sr. No. EBP-6015-E

One John Deere Tractor complete with equipment

with the value of the hire or use thereof during the detention, to-wit:

from May, 1961, to Date, 19

James Owens, Jr., Plaintiff's Attorney.

No. 14937

Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff.

VS.

W.C. STANFORD

Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed

11-3

, 1961

Alvin J. Huerck

Clerk.

Plaintiff's Attorney

Defendant's Attorney

Defendant resides at Route 1,
Daphne, Alabama.

To The Sheriff of Said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Alvin J. Huerck

Clerk.

Defendant lives at

Received in office

11/3

, 1961

Sheriff.

I have executed this summons

this _____, 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

RELEASE OF GARNISHMENT

CIRCUIT Court of BALDWIN County, Alabama

RE: FIRST NATIONAL BANK OF BAY MINETTE
vs. Plaintiff.

W.C. STANFORD
Defendant.

To: INTERNATIONAL PAPER CO., A CORP., Southern Kraft Division
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 19th day of July, 1962

Alice J. Duck, CLERK.

State of Alabama

BALDWIN COUNTY

TO W. C. Stanford, Defendant.....

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

First National Bank of Bay Minette,
a national banking association, Plaintiff.....versus W. C. Stanford, Defendant.....

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

Southern Kraft Division of International Paper Co., a corp.

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 16.....day of May, 1962.Alice J. Duck
Clerk of the Circuit Court.

2216
9102
4932

NOTICE
TO DEFENDANT OF GARNISHMENT
BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
TO

FIRST NATIONAL BANK OF BAY

MINETTE, a national banking
association,

Plaintiff.....

VS.

W.C. STANFORD

Rt 1 Box 257
Maple

Defendant.....

RETURNED 5-23-62
Not found in my County after diligent search and inquiry.
RAY D. BRIDGES, Sheriff

By B. F. Harris

J. Connor Owens
Atty

Received 16th day of May 1962
and on 20th day of June 1962
I served a copy of the within Notice
on W.C. Stanford

By service on

TAYLOR WILKINS, Sheriff

By Fred Seibert D.S.

Sheriff claims 44 miles at

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY Seibert

DEPUTY SHERIFF

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

No. _____

NOVEMBER, 1961

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon W.C. STANFORD

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 the same, then and there to answer the complaint of _____

FIRST NATIONAL BANK OF BAY MINETTE, ALABAMA, a national banking association,

Witness my hand this 3 day of November, 1961.

Beisig J. French Clerk.

COMPLAINT

FIRST NATIONAL BANK OF BAY MINETTE, a national banking association

W.C. STANFORD

Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

1955 Ford 4-Dr Sedan Sr. No. EBP-6015-E

One John Deere Tractor complete with equipment

with the value of the hire or use thereof during the detention, to-wit:

from May, 1961, to Date, 19

J. French Plaintiff's Attorney.

Recalled by order
of Plan. Att.
#932

No. _____

Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff.

VS.

W.C. STANFORD

Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed _____, 19____

Clerk.

Plaintiff's Attorney

Defendant's Attorney

Defendant resides at Route 1,
Daphne, Alabama.

To The Sheriff of Said County:

Whereas, the Plaintiff in the within stated cause
has made affidavit and given bond as required
by law you are hereby required to take the pro-
perty mentioned in Complaint into your posses-
sion unless the Defendant gives bond payable to
the Plaintiff with sufficient surety in double the
amount of the value of the property, with condi-
tion that if the Defendant is cast in the suit he
will within thirty days thereafter, deliver the
property to the Plaintiff, and pay all damages
and costs which may accrue from the detention
thereof.

Alice J. Luck, Clerk.

Defendant lives at

Received in office

, 19____

Sheriff.

I have executed this summons

this _____, 19____

by leaving a copy with

, Sheriff

, Deputy Sheriff

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, First National Bank of Bay Minette

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
of said County, against W. C. Stanford

for the sum of Two hundred and two and 83/100--- Dollars and whereas, the said

First National Bank of Bay Minette

has entered into bond, and made affidavit by law that the said W. C. Stanford

is indebted to it in the sum of Two hundred and two and 83/100

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 International Paper Co., a corp, Southern Kraft Division

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said

International Paper Co.

_____ in said Court within 30 days from the service
to be and appear ~~at the~~ ~~terms of the Court Court~~ ~~at the~~ ~~terms of the Court Court~~

of this writ
be held for the County of Baldwin, on _____ 19____
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 gar-
nishment 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 pro-
perty, and whether you have not in your possession or under your control money or effects be-
longing to the defendant.

Witness my hand this 16 day of May, 1962.

Alice J. Duck Clerk.

Received 17 Day of May 1962
and on 22 Day of May 1962
I serve a Copy of the within Garnishment
on International Paper Co

by service on W H Knox, off mgr

RAY D. BRIDGES, Sheriff

By B F Harris D. S.

Har 3217

No. 4932

Circuit Court of Baldwin County

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

PLAINTIFF,

vs.

Garnishment On Summons

W.C. STANFORD,
DEFENDANT.

Issued _____ day of May, 19 62.

J. Connor Owens, Jr.

Plaintiff's Attorney

5-17-62

BOND

The State of Alabama, }
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, First National Bank of Bay Minette, a national banking association, and Ray C. Stephens and W. M. Kelly

are held and firmly bound unto W. C. Stanford

in the sum of Four hundred and no/100 DOLLARS,

to be paid to the said W. C. Stanford

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 15th day of May, 1962

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound First National Bank of Bay Minette

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. C. Stanford

the sum of Two hundred and two and 83/100 Dollars,

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

Southern Kraft Division of International Paper Co., a corp.

summoning it to answer what it 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.

First National Bank of Bay Minette

BY: Ray C. Stephens (Seal)

Ray C. Stephens (Seal)

W. M. Kelly (Seal)

Approved this 16 day of May, A. D., 1962

Alice J. Duck Clerk.

The 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 he is attorney for Plaintiff and that W. C. Stanford is

indebted to Plaintiff in the sum of Two hundred and two and no/100 Dollars, and that Plaintiff has commenced on suit by summons and complaint on said indebtedness against the said W. C. Stanford

and that Southern Kraft Division of International Paper Co, a corp.

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 believe that process of Garnishment against the said International Paper Co.

is necessary to obtain satisfaction of said claim; and that the said International Paper Co, 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 16 day of May 1962
Alice J. Duck, Clerk Circuit Court.

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No. 4232

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT

First National Bank of

Bay Minette

Plaintiff

TO

W. C. Stanford

Defendant

Bond and Affidavit in Garnishment
on Summons

Filed this 16 day of

MAY 16 1962

ALICE J. DUCK, CLERK, REGISTER Clerk.

Printed by Moore Ptg. Co.