

# SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon RUTH G. CROAKE 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 JAMES D. WALLACE.

Witness my hand this the 24 day of January, 1962.

Alice J. Benson  
Clerk

Exp. 2-13-62 \* \* \* \* \*

5005

## COMPLAINT

JAMES D. WALLACE  
PLAINTIFF

-VS-

RUTH G. CROAKE  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

The Plaintiff claims of the Defendant FIVE HUNDRED THIRTY ONE AND 91/100 (\$531.91) DOLLARS, due by promissory note made by her on May 2, 1961, and payable to the First Bank and Trust Company of Pensacola, Floridaya, on June 6, 1961, with interest thereon, which note was endorsed by the Plaintiff. Said amount was paid to said bank by Plaintiff and the note assigned by said bank to Plaintiff on December 4, 1961.

Said note provides for a reasonable attorney' fee which the plaintiff alleges to be ONE HUNDRED TEN AND 00/100 (\$110.00) DOLLARS.

  
Forest A. Christian, Attorney  
for Plaintiff

The Defendant's address is:  
Route 1, Box 248  
Foley, Alabama

EDUCATION

JAN 24 1962

ALICE L DUCK, CLERK  
REGISTER

SUMMONS

JAMES D. WALLACE

PLAINTIFF

RUTH G. GROAKE

DEFENDANT

Received 24 day of Jan 1962  
and on 13 day of Feb 1962  
I served a copy of the within on Ruth G. Groake  
on \_\_\_\_\_  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

[Signature]

Sheriff claims 110 miles at

Ten Cents per mile Total \$ 11.00

TAYLOR WILKINS, Sheriff

BY [Signature]  
DEPUTY SHERIFF

FILED  
JUN 24 1962  
ALICE J. DICK, CLERK  
REGISTRAR

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

COPY

FOREST A. CHRISTIAN

ATTORNEY AT LAW

FOLEY, ALABAMA

March 21, 1962

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

Dear Judge Hall:

Kindly render judgment in the following cases by default on promissory notes which are enclosed:

1. James D. Wallace vs Ruth G. Croake, Case No. 5005, Promissorywaive note total \$650.00
2. Bank for Savings & Trust vs Joseph F. Duchac, Case No. 5010, default judgment on promissory note in the amount of \$352.00.

Thank you.

Cordially yours



FOREST A. CHRISTIAN

J. D. WALLACE,

PLAINTIFF

VS

RUTH G. CROOKE,

DEFENDANT

AND

DR.'S J. MICHAELSON, JOHN  
FOSTER, AND RICHARD A. ROWE,

GARNISHEES

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

STIPULATION AND AGREEMENT

Comes now the Plaintiff, by its Attorney, the Defendant, individually, and Garnishees, by J. Michaelson, one of their number, and stipulate and agree as follows:

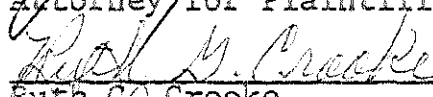
The Garnishee admits indebtedness to the Defendant in the amount of \$147.36 per month take-home pay, and offers and agrees to pay directly to the Attorney for Plaintiff \$30.00 per month therefrom, so long as Defendant remains an employee of Garnishee;

Defendant agrees to the aforesaid deduction of \$30.00 per month from her pay, and to the payment of same directly to Attorney for Plaintiff for and on her account;

Plaintiff by its attorney agrees to the aforesaid arrangement, and to the filing of this stipulation and agreement in open court.

All done on this 18<sup>th</sup> day of June, 1962.

  
Attorney for Plaintiff

  
Ruth G. Crooke

  
J. Michaelson

  
Attorney for Garnishees

FILED

JUN 21 1962

ALICE J. DUCK, CLERK  
REGISTER

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 April Term, 19 62, of the Circuit Court of Baldwin County,  
to-wit: On the 17th day of April, 19 62, being a regular day of  
said term, J. D. WALLACE

recovered judgment against MRS. RUTH G. CROAKE

for the sum of SIX HUNDRED FIFTY AND 00/100 DOLLARS Dollars, and cost of suit,  
and affidavit having been made by FOREST A. CHRISTIAN, as attorney  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

Dr.'s J. MICHAELSON, JOHN FOSTER and RICHARDA. ROWE, d/b/a  
South Baldwin Clinic

has or is believed to have in their possession, or under their control money  
or effects belonging to said defendant or that they are is, or  
is believed to be indebted to said defendant 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

Dr.'s J. MICHAELSON, JOHN FOSTER and RICHARD A. ROWE, d/b/a  
South Baldwin Clinic

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House  
thereof, in the city of Bay Minette, on the within thirty days Monday in Monday A. 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 their answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer they was was indebted to said defendant  
and whether they will not be indebted in future to said defendant  
by a contract then existing, and whether by a contract then existing they  
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 they have has not in their possession or under their control money or  
effects belonging to the defendant MRS. RUTH G. CROAKE

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

Witness, ALICE J. DUCK, Clerk of said Court, this 9th day of May, A. D., 19 62

Issued 9th day of May A. D., 19 62.

ATTEST:

Alice J. Duck, Clerk.

Circuit Court, Baldwin County

No. 5005 1/2

J. D. Wallace

VS. } Garnishment On Judgment

Mrs. Ruth B. Croake

Issued 9 day of May 1962

Returnable        day of        19  

F. A. Christian  
Attorney

Received 9 day of May 1962  
and on 15 day of May 1962

I served a copy of the within Days  
on Mrs. J. Michaelson  
John Foster, + Richard A. Rowe  
By service on Henry Schofield  
Auditor

TAYLOR WILKINS, Sheriff

By Delbert Pearson S.

Isley

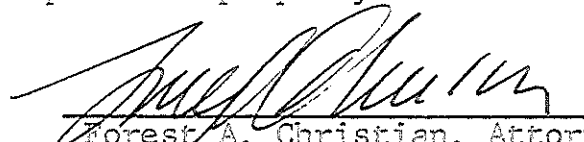
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AFFIDAVIT ON JUDGMENT

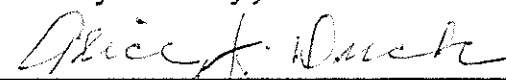
THE STATE OF ALABAMA, )

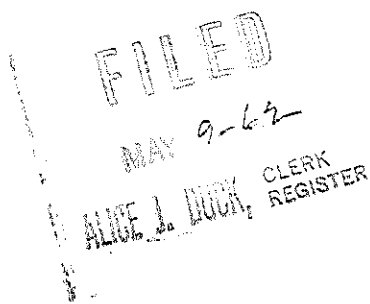
BALDWIN COUNTY. )

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 April 17th Term, A.D., 1962, in the Circuit Court of Baldwin County recovered a judgment against RUTH G. CROAKE for the sum of SIX HUNDRED FIFTY AND 00/100 (\$650.00) DOLLARS and the further sum of TWENTY SEVEN AND 50/100 (\$27.50) DOLLARS cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Dr.'s J. MICHAELSON, JOHN FOSTER and RICHARD A. ROWE, d/b/a SOUTH BALDWIN CLINIC have or are believed to have in their possession or under their control, money or effects belonging to the defendant, or that they have or are believed to be indebted to the defendant, or they are to be liable to her 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.

 (SEAL)  
Forest A. Christian, Attorney for  
J. D. Wallace, judgment creditor

Sworn to and subscribed before me this  
9th day of May, 1962.

  
Alice J. Duck, Clerk of Court



State of Alabama

BALDWIN COUNTY

TO Mrs. Ruth G. Croake, Defendant:

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

J.D. Wallace, Plaintiff,

versus Mrs. Ruth G. Croake, Defendant,

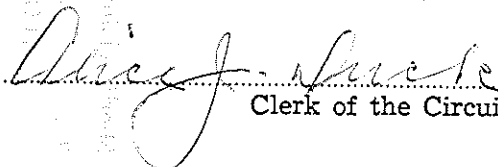
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

Dr.'s J. Michaelson, John Foster &amp; Richard A. Rowe, d/b/a South Baldwin Clinic

have been named as Garnishees.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 9th

day of May, 1962.

  
Clerk of the Circuit Court.



5005 1/2

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

MRS. RUTH G. CROAKE

J. D. WALLACE

Plaintiff

VS.

MRS. RUTH G. CROAKE

Defendant

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

Received 9 day of May 1962  
and on 15 day of May 1962  
I served a copy of the within Notice  
on Mrs. Ruth G. Croake

By service on

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

[Signature]

Forest A. Christian, Atty.