

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CARR-BOSWELL TRACTOR COMPANY, a corporation, 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 R. A. Keenan doing business under the name and style of Keenan's Service Station.

Witness my hand, this the 29 day of April, 1963.

Alice J. Duck  
Clerk

R. A. KEENAN, doing business under  
the name and style of Keenan's  
Service Station,

Plaintiff,

vs

CARR-BOSWELL TRACTOR COMPANY,  
a corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 5553

COUNT ONE

The Plaintiff claims of the Defendant THREE HUNDRED FIFTEEN & 40/100 (\$315.40) DOLLARS, due from it by account on the 20th day of December, 1962, with interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant THREE HUNDRED FIFTEEN & 40/100 (\$315.40) DOLLARS, on account stated between the Plaintiff and the Defendant on the 1st day of January, 1963, with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant THREE HUNDRED FIFTEEN & 40/100 (\$315.40) DOLLARS, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 20th day of December, 1962, with interest thereon, is still unpaid.

FILED

APR 29 1963

ALICE J. DUCK, CLERK  
REGISTER

John P. Beeline  
Attorney for Plaintiff

FILED

FORWARDED FOR DISTRICT  
John B. Brown

and interest thereon, is still unpaid.

By the Plaintiff to the Defendant on the 30th day of December, 1905,

\$ 100.00 (\$312.70) DOLLARS, for merchandise, goods and chattels sold

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY

thereon, is still unpaid.

COUNT THREE

\$ 100.00 (\$312.70) DOLLARS, on account saved between the Plaintiff

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY

COUNT TWO

December, 1905, when interest thereon, is still unpaid.

\$ 100.00 (\$312.70) DOLLARS, due from the Plaintiff on the 30th day of

The Plaintiff claims of the Defendant THREE HUNDRED EIGHTY

COUNT ONE

5553

R. A. Keenan  
d/b/a Keenan's Service Station

VS.

Carr-Boswell Truck Co

FILED  
APR 20

CLERK  
REGISTER

*Handwritten signature*

Received 29 day of April 1906

and on 30 day of April 1906

served a copy of the within \$4 C  
on Carr-Boswell Truck Co

By service on Walter Carr  
Present

TAYLOR WILKINS, Sheriff  
By *Handwritten signature* D. S.

*Handwritten signature*

Sheriff claims \$0 miles at  
Ten Cents a mile Total \$5.00  
TAYLOR WILKINS, Sheriff  
BY DEPUTY SHERIFF

Witness my hand and the seal of said County, 1906.

THE STATE OF ALABAMA {  
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, R. A. Keenan,Town of Robertsdale, of the County of Baldwin State of Alabama,are held and firmly bound unto Carr-Boswell Tractor Company, a corporation,in the sum of Six Hundred Fifty & No/100 (\$650.00) Dollars, to

be paid to the said Carr-Boswell Tractor Company, a corporation, its, successors  
~~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 and severally, firmly  
 by these presents.

Sealed with our seals and dated the 26th day of April, 19 63.

The Condition of this Obligation is such:

That whereas, the above bounden R. A. Keenan operating under the name and  
style of Keenan's Service Station, haS, on the day of the date  
 hereof, prayed an Attachment at the suit of R. A. Keenan, operating under the name and  
style of Keenan's Service Station against the estate of above named  
Carr-Boswell Tractor Company, a corporation,

for the sum of Three Hundred Fifteen & 40/100 (\$315.40) Dollars,  
 and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said R. A. Keenan, operating under the name and style of  
Keenan's Service Station should prosecute said Attachment to effect, and pay the said Defendant all such damages as it  
 may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be  
 void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now,  
 or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

R. A. Keenan (Seal)  
Wilton J. Clive (Seal)  
Gewin B. Clement (Seal)  
 \_\_\_\_\_ (Seal)

Approved, this 26 day of April, 19 63

Clive J. Clive Clerk

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, John P. Beebe, Notary Public, in and for said State and  
County, \_\_\_\_\_

~~XXXXXXXXXXXX~~, personally appeared R. A. Keenan

who, being duly sworn, on oath saith that ~~-----Carr-Boswell Tractor Company, a corporation,~~

justly indebted to

Keenan's Service Station

in the sum of Three Hundred Fifteen & 40/100 (\$315.40) Dollars.

which said amount is justly due after allowing all just offsets and discounts, and that the said\_\_\_\_\_

Defendant is about fraudulently to dispose of its property

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

Subscribed and sworn to before me this 26th day of April, 1963

Notary Public, State of Alabama at Large  
My commission expires July 30, 1963  
Bonded by Employers Liability Assurance  
Corporation, day

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STATE OF ALABAMA  
Baldwin County

**CIRCUIT COURT**  
At Bay Minette, Ala.

Or,

ATTACHMENT BOND AND AFFIDAVIT

Filed this the \_\_\_\_\_ day \_\_\_\_\_

of -----, 19

\_\_\_\_\_, Clerk

Attorney

ATTACHMENT

The State of Alabama, {  
Baldwin County. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, R. A. Keenan, doing business under the name and style  
of Keenan's Service Station

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
Carr-Boswell Tractor Company, a corporation,

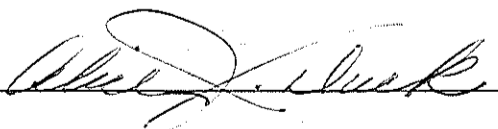
is justly indebted to the Plaintiff R. A. Keenan, doing business under the name and  
style of Keenan's Service Station,

in the sum of Three Hundred Fifteen & 40/100 (\$315.40) Dollars, and

R. A. Keenan 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  
Carr-Boswell Tractor Company, a corporation,

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be  
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said  
County, on \_\_\_\_\_ Monday of \_\_\_\_\_ 19\_\_\_\_\_  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 26th day of April A. D., 1963..

 Clerk.

58 Dodge truck  
L8D 3-15796  
Brown

No. 5552

## ATTACHMENT

R. A. Keenan doing business  
under name & style of  
Keenan's Service Station  
Vs. ATTACHMENT

Cass Beswell Trustee  
Co.

Issued April 26, 1962

Printed by Moore Printing Co.

John P. Beebe

Exequited by serving a writ of attachment  
and attaching - 1-1958 - 1-ton Dodge  
truck motor No L8D.3-15796 and one  
utility trailer.

April 26th 1962

Rebels - 50 mi Taylor Wilkins Sheriff

Sheriff claims 50 miles  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY Wilkins Sheriff

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

April 27th, 1963

Mrs. Alice J. Duck, Clerk,  
Circuit Court, Baldwin County,  
Bay Minette, Alabama.

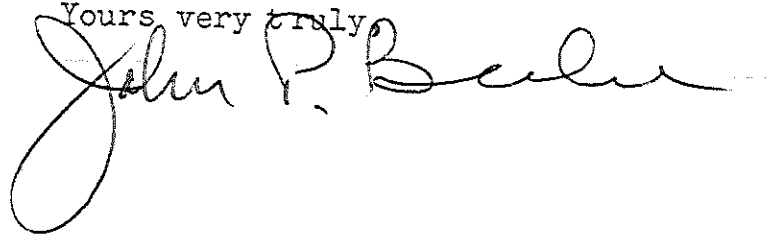
Dear Mrs. Duck:

I enclose original and copy of summon and complaint in the matter of R. A. Keenan, doing business under the name and style of Keenan's Service Station vs. Carr-Boswell Tractor Company, a corporation.

Please file in the proceeding in which attachment was issued by you yesterday in the same matter.

The Sheriff can serve the defendant in Robertsdale.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".

enclosure