

E. D. BYRD, DOING BUSINESS )  
AS BYRD'S GARAGE, )

Plaintiff, )

vs )

James W. Davison, )

Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

CIVIL DIVISION

5591

COUNT ONE:

The plaintiff claims of the Defendant ONE HUNDRED NINETY and NO/100 (\$190.00) DOLLARS due from him by account on the 15th day of January, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant ONE HUNDRED NINETY and NO/100 (\$190.00) DOLLARS, on account stated between the plaintiff and the defendant on the 15th day of January, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT THREE:

The plaintiff claims of the defendant ONE HUNDRED NINETY and NO/100 (\$190.00) DOLLARS for merchandise, goods and chattels sold by the plaintiff to the defendant on the 15th day of January, 1963, which sum of money, with interest thereon, is still unpaid.

E. D. Byrd

Defendant's Address:  
Brady Road  
Bay Minette, Alabama

PLAINTIFF DEMANDS A TRIAL  
BY JURY IN THIS CAUSE.

E. D. Byrd

FILED

JUN 3 1963

ALICE I. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

JUNE

TERM, 19 63

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES W. DAVISON

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, State of Alabama, at Bay Minette, against \_\_\_\_\_

said James W. Davison

Defendant

by E. D. BYRD, d/b/a Byrd's Garage,

Plaintiff

Witness my hand this 3rd day of June 19 63

Clerk

No. 5391

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

E. D. BYRD, d/b/a

Byrd's Garage,

vs.

Plaintiffs

JAMES W. DAVISON,

Defendants

**SUMMONS and COMPLAINT**

Filed 3 June, 19 63

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

**FILED**  
JUN 3 1963  
ALICE L. DUCK, CLERK  
REGISTER

Kenneth Cooper

Plaintiff's Attorney

Defendant's Attorney

Defendant lives ~~XX~~ on  
Brady Road, Bay Minette.

RECEIVED IN OFFICE

June 3, 19 63

\_\_\_\_\_, Sheriff

I have executed this summons

this June 5, 19 63

by leaving a copy with

James W Davison

Sheriff claims 10 miles at 10¢  
Ten Cents per mile Total \$ 1.00  
BY TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Zelbit Deputy Sheriff

5 miles East of B.M.

E. D. BYRD, d/b/a  
BYRD'S GARAGE

Plaintiff

vs

JAMES W. DAVISON

Defendant

X

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW NO. 5591

X

X

TO THE SHERIFF OF SAID COUNTY, --GREETING:

You are hereby commanded to notify the said plaintiff that on the 13 day of Sept, 1963, the said defendant filed in said cause his claim of exemptions.

You are required to execute this process instanter, and return the same immediately upon the execution thereof.

Witness my hand this 13 day of Sept, 1963.

Alice J. Newkirk  
Clerk

STATE OF ALABAMA  
BALDWIN COUNTY

TO E. D. BYRD, the Plaintiff in the Case of E. D. BYRD, d/b/a  
BYRD'S GARAGE v. JAMES W. DAVISON:

You are hereby notified that James W. Davison, the defendant in the above named action, has this day filed with me a claim in writing, verified by oath, claiming as exempt to him the following described property:

1 - 1954 Ford truck 1½ ton of a value of \$500.00 subject to a \$300.00 mortgage to G. H. Jackson Perdido, Alabama, Equity	\$200.00
1 - Poulan Chainsaw, value	200.00
1 - Homelite Chainsaw, value	250.00
	<u>650.00</u>
Wages, earnings or profits	\$350.00

Alice J. Newkirk

5591

Received 23 day of Sept 1963  
on 3 day of Oct 1963  
served a copy of the within notice  
James W. Davidson  
E. D. Byrd  
service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. L. Albert D. S.  
Peididw

Sheriff claims 26 miles at  
Ten Cents per mile Total \$ 2.60  
BY W. L. Albert Sheriff  
TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

E. D. Byrd  
attn  
Byrd's Garage

VS.  
James W. Davidson

STATE OF ALABAMA  
BALDWIN COUNTY

I, James W. Davison, a resident of the State of Alabama and county aforesaid, do hereby make and file this my declaration in writing, under oath, that I have claimed and do claim and set apart as being exempt from levy, seizure, or sale under execution or other process for the collection of debts, with particular reference to that certain judgment in the Circuit Court of Baldwin County, Case No. 5591, being E. D. Byrd, d/b/a Byrd's Garage v. James W. Davison, the following described property owned by me, to-wit:

1 - 1954 Ford Truck 1½ ton of a value of \$500.00 subject to a \$300.00 mortgage to G. H. Jackson Perdido, Alabama, Equity	\$200.00
1 - Poulan Chainsaw, value	200.00
1 - Homelite chainsaw, value	250.00
	<u>\$650.00</u>
Wages, earnings or profits	\$350.00

J. W. Davison

1963.

Sworn to and subscribed before me this the 23 day of Sept.

L. P. Simpson  
Notary Public, Baldwin County, Alabama

FILED

SEP 23 1963

ALICE I. DUCK, CLERK  
REGISTER