

INSTRUCTIONS

SENDER:

Write (or type) message, pull out yellow sheet, mail the other two.

RECIPIENT:

Write your reply at bottom, mail back white sheet and keep the pink.

NCR  
REGISTERED U.S. PATENT OFFICE  
OF THE BUSINESS FORM SERVICE INC.  
MADE IN U.S.A.T  
OMrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, AlabamaF  
R  
O  
MJOHN V. DUCK & RICHARD C. LACEY  
Attorneys At Law  
310 Magnolia Avenue  
FAIRHOPE, ALABAMA

SUBJECT:

John V. Duckell v. Jo

DATE:

June 10, 1963

5598

Message - Reply

FOLD

THIS IS NCR (NO CARBON REQUIRED) PAPER.

(JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION  
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.)

Form 87 - New England Business Service, Inc., Townsend, Mass.

Dear Mrs. Duck:

Enclosed herewith is the complaint and other papers  
in connection with the above suit. Which we would appreciate  
having filed and served as necessary.

Sincerely,

SIGNED:

DATE OF REPLY:

REPLY TO:

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

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CIRCUIT COURT

Whereas, DALE A. RADDCLIFFE

for the sum of Two Hundred Ninety-Two & 35/100---Dollars and whereas, the said

has entered into bond, and made affidavit by law that the said JOSE VASQUEZ

is indebted to \_\_\_\_\_  
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 JOE ALLEGRI

YOU ARE THEREFORE, commanded to summon the said JOE ALLEGRI

~~be made~~ 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 11 day of June, 1963  
Alice J. Albrecht  
Clerk.

No. 5598

**Circuit Court of Baldwin County**

Dale A. Radcliff

VS.

**Garnishment On Summons**

Jose Vasquez

Issued 11 day of June, 19 63

\_\_\_\_\_  
Plaintiff's Attorney

## BOND

The State of Alabama, }  
Baldwin County

## CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, DALE A. RADDCLIFFE, J. J. KAMPER AND GEORGE N. BARKLEYare held and firmly bound unto JOSE VASQUEZin the sum of SIX HUNDRED (\$600.00) DOLLARS,to be paid to the said JOSE VASQUEZ, his

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 10th day of June, 19 63

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

DALE A. RADDCLIFFE, J. J. KAMPER AND GEORGE N. BARKLEY

has s commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said JOSE VASQUEZ

the sum of TWO HUNDRED NINETY-TWO AND 35/100 (\$292.35) Dollars,and has s on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court toJOE ALLEGRI

summoning him to answer what he is indebted to said Defendant, or what effects of said Defendant he has in his possession, or under his 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.

(Seal)

(Seal)

(Seal)

Approved this \_\_\_\_\_ day of \_\_\_\_\_ A. D., 19\_\_\_\_

Clerk.

BOND

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, ~~DALE A. RADDCLIFFE, J. J. KAMPER AND GEORGE N. BARKLEY~~

are held and firmly bound unto JOSE VASQUEZ

in the sum of SIX HUNDRED (\$600.00) DOLLARS,

to be paid to the said JOSE VASQUEZ, his

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 10th day of June, 19 63

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

DALE A. RADDCLIFFE,

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said JOSE VASQUEZ

the sum of TWO HUNDRED NINETY-TWO AND 35/100 (\$292.35) Dollars,

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

JOE ALLEGRI

summoning him to answer what he is indebted to said Defendant, or what effects of said Defendant he has in his possession, or under his 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.

(Seal)

(Seal)

(Seal)

Approved this \_\_\_\_\_ day of \_\_\_\_\_ A. D., 19\_\_\_\_

\_\_\_\_\_  
Clerk.

State of Alabama

BALDWIN COUNTY

TO JOSE VASQUEZ....., Defendant.....:YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of DALEA. RADDCLIFFE....., Plaintiff.....,versus JOSE VASQUEZ....., Defendant.....,now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which JOE ALLEGRI

has been named as Garnishee.....

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

day of ....., 194.....

Clerk of the Circuit Court.

Copy to the Circuit Court

2nd of

IN MATTER HERETOFORE

FOR THE PURPOSE OF

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

DALE A. RADELIFFE

Plaintiff

VS.

JOSE VASQUEZ

Defendant

CLERK OF CIRCUIT COURT

State of Alabama

BALDWIN COUNTY

TO JOSE VASQUEZ, Defendant

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

A. RADDCLIFFE, Plaintiff

versus JOSE VASQUEZ, Defendant

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

has been named as Garnishee

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

day of \_\_\_\_\_, 194

\_\_\_\_\_  
Clerk of the Circuit Court.



## BOND

The State of Alabama, }  
Baldwin County

## CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, DALE A. RADDCLIFFE, J. J. KAMPER AND GEORGE N. BARKLEYare held and firmly bound unto JOSE VASQUEZin the sum of SIX HUNDRED (\$600.00) DOLLARS,to be paid to the said JOSE VASQUEZ, his

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 10th day of June, 1963

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

DALE A. RADDCLIFFE, J. J. KAMPER AND GEORGE N. BARKLEY

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said JOSE VASQUEZ

the sum of TWO HUNDRED NINETY-TWO AND 35/100 (\$292.35) Dollars,

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

JOE ALLEGRI

summoning him to answer what he is indebted to said Defendant, or what effects of said Defendant he has in his possession, or under his 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.

Dale A. Raddcliff (Seal)J. J. Kamper (Seal)George N. Barkley (Seal)Approved this 11 day of June A. D., 1963Rebecca J. Newcomb Clerk.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

## CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, DALE A. RADDCLIFFE

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court  
of said County, against JOSE VASQUEZ

for the sum of Two Hundred Ninety-Two & 35/100---Dollars and whereas, the said  
DALE A. RADDCLIFFE

has entered into bond, and made affidavit by law that the said JOSE VASQUEZ

is indebted to Plaintiff in the sum of \$292.35

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 JOE ALLEGRI

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said JOE ALLEGRI

to be and appear at the term of the Circuit Court, to

~~be~~ 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 11 day of June, 19 63

Allegri  
Clerk.

Exp-6-11-63

Received 11 day of June 1963  
on 11<sup>th</sup> day of June 1963  
Received a copy of the within Bar.  
for Allegria

service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By Fred Lulak D. S.  
Belford

Sheriff claims 30 miles at  
Ten Cents per mile Total \$ 5.00  
BY Fred Lulak Sheriff  
DEPUTY SHERIFF

No. 5598  
Circuit Court of Baldwin County

Dale A. Radcliffe

VS.  
Garnishment On Summons

Jose Vasquez

Issued 11 day of June, 1963

Plaintiff's Attorney

State of Alabama  
BALDWIN COUNTY

TO ..... JOSE VASQUEZ ..... , Defendant.....

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of DALE  
A. RADDCLIFFE ..... , Plaintiff.....  
versus ..... JOSE VASQUEZ ..... , Defendant.....

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

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 11  
day of June, 1963.

*Alfred J. Smith*  
Clerk of the Circuit Court.

225598

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

DALE A. RADELIFFE

Plaintiff.....

VS.

JOSE VASQUEZ

Defendant.....

Received 11 day of June 1968  
and on 11/15 day of June 1968  
served a copy of the within Notice  
on Jose Vasquez

by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Fred Schubert D. S.

Belmont

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY Fred Schubert  
DEPUTY SHERIFF

DALE A. RADDCLIFFE,	)	IN THE CIRCUIT COURT
	:	
Plaintiff,	)	
	:	OF
vs.	)	
	:	
JOSE VASQUEZ,	)	BALDWIN COUNTY, ALABAMA
	:	
Defendant.	)	AT LAW

700.5598

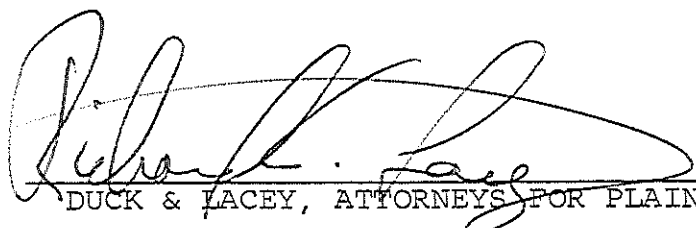
COMPLAINT

COUNT ONE: The Plaintiff claims of the Defendant the sum of Two Hundred Ninety-Two and 35/100 Dollars (\$292.35) as damages, for that, heretofore, on, to-wit, the 26th day of May, 1963, the Plaintiff was operating an automobile on a public highway, viz: Alabama Highway No. 104, of this State and County, at or in the intersection of the Belforest Road and said Alabama Highway No. 104, near the City of Fairhope, Baldwin County, Alabama, where he had a right to be, and the Defendant, JOSE VASQUEZ, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating, to run over, upon or against the automobile in which the Plaintiff was then and there operating; and Plaintiff avers as a proximate consequence thereof, Plaintiff suffered great damage and injuries to Plaintiff's automobile; the left front door, left front fender, top, left front door glass, windshield glass, and other parts of Plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged and injured as aforesaid.

FILED

JUN 11 1963

ALICE J. DUCK, CLERK  
REGISTER

  
DUCK & LACEY, ATTORNEYS FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. 5592

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Jose Vasquez

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

Jose Vasquez

Defendant

by

Dale A. Raddcliffe

Plaintiff

Witness my hand this 11th day of June 19 63

Alice D. Smith, Clerk

No. 5598

Page

# STATE of ALABAMA

Baldwin County

## CIRCUIT COURT

DALE A. RADDCLIFFE

Plaintiffs

vs.

JOSE VASQUEZ

Defendants

### Summons and Complaint

Filed June 11, 19 63

Alice J. Duck Clerk

Richard C. Lacey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

June 11, 19 63

Sheriff.

I have executed this summons  
this 11<sup>th</sup> day of June 1963  
by leaving a copy with

Jose Vasquez  
Belfer

Sheriff claims 50

Ten Cents per mile Total \$ 5.00 miles

BY TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.