

5625

State of Alabama  
BALDWIN COUNTY

TO Nonnie V. Waters, Defendant:

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

Kenneth Cooper, Plaintiff,

versus Nonnie V. Waters, Defendant,

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

~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~ ALICE J. DUCK

has been named as Garnishee.....

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

day of June, 1963.

*Alice J. Duck*  
Clerk of the Circuit Court.

5425

Received \_\_\_\_\_ day of \_\_\_\_\_ 19  
and on 17th day of July 1962  
I served a copy of the within Notice on Nonnie V. Waters

BY SERVICE ON  
Taylor Wilkins  
TAYLOR WILKINS, Sheriff

G. J. [Signature]

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

TO

Kenneth Cooper  
Plaintiff

VS.

Nonnie V. Waters,  
Defendant

Defendant

CLERK OF CIRCUIT COURT

BOND

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, ~~Kenneth Cooper~~

are held and firmly bound unto ~~NONNIE V. WATERS~~

in the sum of ~~TWO THOUSAND SIX HUNDRED~~ DOLLARS,

to be paid to the said ~~NONNIE V. WATERS, her~~

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 \_\_\_\_\_ day of ~~June~~, 19~~63~~

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

~~Kenneth Cooper~~

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said ~~Nonnie V. Waters~~

~~the sum of ONE THOUSAND THREE HUNDRED (\$1,300.00) Dollars,~~

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

~~XXXXXXXXXXXXXXXXX~~ Alice J. Duck

summoning ~~her~~ to answer what ~~she~~ indebted to said Defendant, or what effects of said Defendant ~~has~~ in ~~her~~ possession, or under ~~her~~ 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 ~~she~~ 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 ~~I~~ hereby severally certify that ~~I~~ have property free from all incumbrance, to the full amount of the above bond.

*Kenneth Cooper* (Seal)

\_\_\_\_\_ (Seal)

\_\_\_\_\_ (Seal)

Approved this \_\_\_\_\_ day of ~~June~~ A. D., 19~~63~~

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

The State of Alabama }  
Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared Kenneth Cooper

who, being duly sworn, doth depose and say that Nonnie V. Waters

indebted to him in the sum of One Thousand Three Hundred Dollars,  
and that he has commenced on suit by summons and complaint on said indebtedness  
against the said Nonnie V. Waters

and that Alice J. Duck

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in her  
possession, or under her control, and that he believe that process of Garnishment against the said  
Nonnie V. Waters

is necessary to obtain satisfaction of said claim; and that the said Alice J. Duck  
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.

Kenneth Cooper

Sworn to and subscribed before me this 28 day of June 19 63

Alice J. Duck, Clerk Circuit Court.

116

No. 5625

THE STATE OF ALABAMA  
Baldwin County.

CIRCUIT COURT

KENNETH COOPER

Plaintiff

TO

NONNIE V. WATERS

Defendant

Bond and Affidavit in Garnishment  
on Summons

Filed this \_\_\_\_\_ day of  
JUNE, 19 63

Clerk.

The State of Alabama  
Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

Kenneth Cooper

in and for said County, personally appeared

who, being duly sworn, doth depose and say that

Nonnie V. Waters

indebted to him in the sum of One Thousand Three Hundred Dollars,

and that he has commenced on suit by summons and complaint on said indebtedness against the said Nonnie V. Waters

and that Alice J. Duck

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in her possession, or under her control, and that he believe that process of Garnishment against the said Nonnie V. Waters

is necessary to obtain satisfaction of said claim; and that the said Alice J. Duck 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.

*Kenneth Cooper*

Sworn to and subscribed before me this June 19 63

Alice J. Duck, Clerk Circuit Court.

116

|     |   |               |                |           |    |                  |           |   |            |        |    |        |
|-----|---|---------------|----------------|-----------|----|------------------|-----------|---|------------|--------|----|--------|
| No. | THE STATE OF ALABAMA<br>Baldwin County. | CIRCUIT COURT | KENNETH COOPER | Plaintiff | TO | NONNIE V. WATERS | Defendant | Bond and Affidavit in Garnishment<br>on Summons | Filed this | day of | 19 | Clerk. |
|     |   |               |                |           |    |                  |           |   | JUNE       |        | 63 |        |

BOND

The State of Alabama,  
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Kenneth Cooper

are held and firmly bound unto NONNIE V. WATERS

in the sum of TWO THOUSAND SIX HUNDRED DOLLARS,

to be paid to the said NONNIE V. WATERS, her

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 June day of June, 1963

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

Kenneth Cooper

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 Nonnie V. Waters

the sum of ONE THOUSAND THREE HUNDRED (\$1,300.00) Dollars,

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

~~NONNIE V. WATERS~~ Alice J. Duck

summoning her to answer what she indebted to said Defendant, or what effects of said Defendant has in her possession, or under her 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 she 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 I hereby severally certify that I have property free from all incumbrance, to the full amount of the above bond.

Kenneth Cooper (Seal)

\_\_\_\_\_ (Seal)

\_\_\_\_\_ (Seal)

Approved this 25 day of June June A. D., 1963

Levin J. ... Clerk.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. ....

JUNE TERM, 1963

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

NONNIE V. WATERS

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 .....

NONNIE V WATERS

Defendant

by

KENNETH COOPER

Plaintiff

Witness my hand this

28

day of

JUNE

19

63

Alice J. Duck

Clerk

**STATE of ALABAMA**

Baldwin County

CIRCUIT COURT

KENNETH COOPER

Plaintiffs

vs.

NONNIE V. WATERS

Defendants

Summons and Complaint

Filed JUNE 1963

Alice J. Puck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

TRANSIT

Received In Office

\_\_\_\_\_, 19\_\_\_\_\_

Sheriff.

I have executed this summons  
this July 12th 1963  
by leaving a copy with  
Nonnie V. Waters

[Signature]  
Sheriff.

Deputy Sheriff.

[Signature]



KENNETH COOPER, )  
 )  
 Plaintiff, )  
 )  
 vs )  
 )  
 NONNIE V. WATERS, )  
 )  
 Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

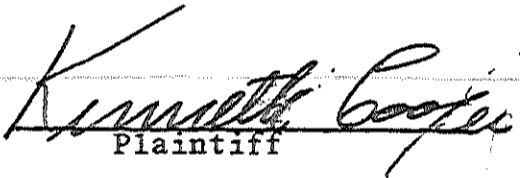
Case No. 5675

COUNT ONE:

Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED (\$1,300.00) DOLLARS, due from her by account on the 25th day of March, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED (\$1,300.00) DOLLARS, for work and labor done for the Defendant by the Plaintiff on the 25th day of September, 1962, at her request, which sum of money, with interest thereon, is still unpaid.

  
Plaintiff

*Filed  
6-28-63*

5626

|               |   |                         |
|---------------|---|-------------------------|
| W. L. WALKER  | ) | IN THE CIRCUIT COURT OF |
| Plaintiff     | ) | BALDWIN COUNTY, ALABAMA |
| -VS-          | ) | AT LAW.                 |
| HARLAN PERYER | ) |                         |
| Defendant     | ) |                         |

BILL OF COMPLAINT

The Plaintiff claims of the Defendant, TWO HUNDRED EIGHTY DOLLARS (\$280.00), the rent of a tract of land, viz:

309 Tensaw Avenue, Fairhope, Alabama.

Demised by the Plaintiff to the Defendant from the First day of December 1962 and ending on July 1st, 1963

*John V. Duck*  
 \_\_\_\_\_  
 Attorney for Plaintiff

**FILED**  
 JUL 20 1963  
 ALICE J. DUCK, CLERK REGISTER

T  
O

Mrs. Alice J. Cook  
Clerk of Circuit Court  
P. O. Box 125  
Bay Minette, Alabama

F  
R  
O  
M

WALTER S. WOODWARD  
Attorney at Law  
577 Magnolia Avenue  
PACIFIC ALABAMA

SUBJECT:

alder vs- pryer *Case No. 567*

DATE:

*10.83*

**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.

M  
E  
S  
S  
A  
G  
E

Dear Mrs. Cook:

Enclosed you will find Surmons Complaint as per above.

WVD/ce  
EJH:l

Sincerely,

SIGNED:

DATE OF REPLY:

*10.83*

REPLY TO:

*John*

R  
E  
P  
L  
Y

SIGNED:

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

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon HARLAN PERYER

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 .....

HARLAN PERYER Defendant

by .....

W. L. WALKER Plaintiff

Witness my hand this 10 day of July 1963

64-7-16-13

Alice J. Walker Clerk

No. 5626

Page \_\_\_\_\_

**STATE of ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

W. L. WALKER

Plaintiffs

vs.

HARLAN PERYER

Defendants

**Summons and Complaint**

Filed \_\_\_\_\_

**FILED**

19 \_\_\_\_\_

**JUL 10 1963**

Clerk \_\_\_\_\_

**ALICE J. DUCK, CLERK REGISTER**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
309 Tensaw Avenue,  
Fairhope, Alabama

Received In Office

July 10, 1963

Sheriff.

I have executed this summons

this 16<sup>th</sup> day of July, 1963  
by leaving a copy with

Harlan Peyer

Sheriff claims 70 miles at  
Total \$ 7.00  
To TAYLOR WILKINS, Sheriff  
BY Fred Schubert  
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Fred Schubert

Deputy Sheriff.

F. Hope