

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Pierce E. Holmes 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 Baldwin County Bank, Inc., a corporation.

WITNESS my hand this 10th day of December, 1963.

Oliver J. Duck
Clerk

Defendant's address is Stockton, Alabama.

* * * * *

BALDWIN COUNTY BANK, INC.,
a corporation,

Plaintiff,

VS.

PIERCE E. HOLMES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

5861

C O M P L A I N T

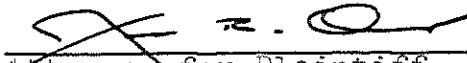
COUNT ONE

The plaintiff claims of the defendant THIRTEEN HUNDRED SIXTY DOLLARS (\$1360.00) due by promissory note made by him on March 1, 1961, and payable in 21 equal installments beginning on April 12, 1961, with interest thereon. Plaintiff avers that in and by the terms of the said promissory note the defendant agreed to pay all expenses in counsel fees, or otherwise, that may accrue in the collection of the said debt and plaintiff avers that a reasonable attorney's fee is One Hundred Eighty-five Dollars (\$185.00) which it herewith claims.

COUNT TWO

The plaintiff claims of the defendant SIXTY-SIX AND 58/100 Dollars (\$66.58), the balance due by promissory note made by the

defendant on November 17, 1961, and payable on the 15th day of January, 1962, with interest thereon. Plaintiff avers that in and by the terms of the said promissory note the defendant agreed to pay all expenses in counsel fees, or otherwise, that may accrue in the collection of the said debt, which attorney fee the plaintiff avers to be \$15.00 and which it herewith claims.


Attorney for Plaintiff

FILED

DEC 10 1963

ALICE L. DUCK, CLERK
REGISTER

Ex- 12-21-63

5861

Baldwin County Bank
Inc. a corp.

JS -

Pierce E. Holmes

FILED

DEC 10 1963

ALICE J. DUCK, CLERK
REGISTER

James R. Allen

Received 18 day of Dec 1963

and on 21 day of Dec 1963

I served a copy of the within D+C
on Pierce E. Holmes

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot
one

6455

BALDWIN COUNTY BANK,
a corporation,

Plaintiff,

VS.

PIERCE E. HOLMES,

Defendant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

586 1/2

WRIT ON JUDGMENT

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, James R. Owen has made affidavit as required by law that on January 21, 1964, in the Circuit Court of Baldwin County, Alabama, the plaintiff, Baldwin County Bank, recovered a judgment against the defendant, Pierce E. Holmes, for the sum of Sixteen Hundred Forty-eight and 10/100 Dollars (\$1648.10) of which the said defendant paid the sum of \$200.00 on March 6, 1964, and \$100.00 on August 1, 1967, and for the further sum of \$28.25 cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Kaiser Aluminum Company has, or is believed to have in its possession or under its control, money or effects belonging to the defendant or that Kaiser Aluminum Company is believed to be indebted to the defendant or to be liable to him 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.

These are, therefore, to command you, that you summon the said Kaiser Aluminum Company to be and appear at the next term of the Circuit Court of Baldwin County to be held for said county, within thirty days after the service of this writ of garnishment then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession or under its control any money or effects belonging to the defendant and whether it will be indebted to said defendant or is liable to him on any contract for the payment of money or the delivery of personal property or on a contract for the payment of

Clerk

CASE NO, 5861½

Served 15 day of Jan. 1968
on 16 day of Jan 1968

Served a copy of the within Notice
Pierce E. Holmes

service on _____

TAYLOR WILKINS, Sheriff
B, W. A. Salbert
3 miles South of B. 13

Sheriff claims 6 miles at
Ten Cents per mile Total \$.60
TAYLOR WILKINS, Sheriff
BY W. A. Salbert
DEPUTY SHERIFF

BALDWIN COUNTY BANK,

A Corporation,

Plaintiff

vs:

PIERCE E. HOLMES,

Defendant:

NOTICE OF GARNISHMENT:

FILED

JAN 15 1968

ALICE J. DUCK CLERK
REGISTER

James R. Owen, Atty

money which may be discharged by the delivery of personal property,
or which is payable in personal property.

WITNESS my hand as Clerk of the Circuit Court of Baldwin
County, Alabama, on this the 15th day of January, 1968.

Alice L. Lusk
Clerk

CASE NO. 5861½

BALDWIN COUNTY BANK,
A Corporation,

Plaintiff,

vs:

PIERCE E. HOLMES,

Defendant:

Kaiswer Aluminum Company

Garnishee

WRIT OF GARNISHMENT

FILED

JAN 15 1968

ALICE J. DUCK
CLERK
REGISTER

James R. Owen, Atty.

Delivered 15 day of Jan 1968
on 16 day of Jan 1968
served a copy of the within Ham.
Kaiser Aluminum Co.

service on Jack Howell

TAYLOR WILKINS, Sheriff
By W. A. Talbot

3 miles South of Hwy

Sheriff claims 6 miles at
Ten Cents per mile Total \$ 60
TAYLOR WILKINS, Sheriff
BY W. A. Talbot
DEPUTY SHERIFF

BALDWIN COUNTY BANK,
a corporation,

Plaintiff,

VS.

PIERCE E. HOLMES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

5861 1/2

AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said county, James R. Owen, who being duly sworn deposes and says that on January 21, 1964, in the Circuit Court of Baldwin County, Alabama, the plaintiff recovered a judgment against the defendant, Pierce E. Holmes, for the sum of Sixteen Hundred Forty-eight and 10/100 Dollars (\$1648.10) of which the judgment debtor paid \$200.00 on March 6, 1964, and \$100.00 on August 1, 1967, and the further sum of \$28⁰⁰, costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Kaiser Aluminum Company has or is believed to have in its possession or under its control, money or effects belonging to the defendant or that Kaiser Aluminum Company is believed to be indebted to the defendant or to be liable to him 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.

Sworn to and subscribed before me on this
the 15 day of January, 1968.

Alice J. Duck
Clerk of the Circuit Court of Baldwin
County, Alabama.

FILED

JAN 15 1968

ALICE J. DUCK CLERK
REGISTER

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