

MALBIS PLANTATION, INC., )  
A corporation,

)

)

)

)

)

)

LAW SIDE  
6082

The Plaintiff claims of the Defendant, THREE HUNDRED TEN AND NO/100 DOLLARS (\$310.00), the rent of a tract of land, viz:

6-Room house with complete bathroom installments; Wall Heater, Gas Stove, Refrigerator & Stove exhaust, said house located on County Road No. 27, 1/2 mile from Malbis Plantation & 1/2 mile from Highway 90, in Baldwin County, Alabama.

demised by the Plaintiff to the Defendant on the 20th day of July, 1963, said rents commencing on the 1st day of December, 1963, and ending on the 30th day of June, 1964.

MASHBURN AND OWENS

By: Charles Owen, Jr.  
Attorneys for Plaintiff.

By: Charles Owen, Jr.  
Attorneys for Plaintiff.

1. The first step is to identify the problem. 2. The second step is to define the problem. 3. The third step is to analyze the problem. 4. The fourth step is to develop a solution. 5. The fifth step is to implement the solution. 6. The sixth step is to evaluate the solution.

1964 22

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. ....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MARY CAMPBELL

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..... MARY CAMPBELL  
....., Defendant.....

by ..... MALBIS PLANTATION, INC., a corporation .....  
..... Plaintiff.....

Witness my hand this..... day of June 19 64

Ex-6-23-64

Alice J. Duck Clerk

No. 6082

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MALBIS PLANTATION, INC.

Plaintiffs

vs.

MARY CAMPBELL

Defendants

SUMMONS AND COMPLAINT

Filed ....June...8..... 19...64

Alice D. Quirk Clerk

Maskburn & Quirk  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Malbis Cut Off

Received In Office

6/8 1964

....., Sheriff

I have executed this summons

this 23rd of June 1964

by leaving a copy with

Mary Campbell

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR, WILKINS, Sheriff

BY Deekest  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Leland Deputy Sheriff

Malbis

State of Alabama

BALDWIN COUNTY

TO MARY CAMPBELL, Defendant.....:

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

MALBIS PLANTATION, INC., a corporation, Plaintiff.....,

versus MARY CAMPBELL, Defendant.....,

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

Vanity Fair Mills, Robertsdale, Alabama

has been named as Garnishee.....

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

day of June, 1964



Clerk of the Circuit Court.

EV-6-23-64

6082

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO

Mary Campbell

Mallis Plantation  
Ira

Plaintiff.....

VS.

Mary Campbell

Defendant.....

Mashburn & Davis

Received 8 day of June 1967  
and on 23<sup>rd</sup> day of June 1967  
I served a copy of the within Notice  
on Mary Campbell

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Frederick D. Mallis

Sheriff claims 40 miles at  
Ten Cents per mile Total \$ 4.00  
TAYLOR WILKINS, Sheriff

BY Deputy  
DEPUTY SHERIFF

BOND

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

6082

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Malbis Plantation, Inc., a corporation, A. Papageorge  
and N. Mallars

are held and firmly bound unto Mary Campbell

in the sum of Six Hundred Twenty and no/100 DOLLARS,  
to be paid to the said Mary Campbell

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 9th day of March, 1964

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound Malbis Plantation, Inc., a corporation

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

the sum of ~~Three hundred Twenty~~ Three hundred Twenty and no/100 Dollars,  
and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to Vanity Fair Mills, Robertsedale, Alabama

summoning it to answer what it is indebted to said Defendant, or what effects of said Defendant has in its possession, or under its 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 it hereby severally certify that it have property free from all incumbrance, to the full amount of the MALBIS PLANTATION, INC., a corporation above bond.

By: P. E. Frankos (Seal)  
A. Papageorge (Seal)  
N. Mallars (Seal)  
N. Mallars.

Approved this 9th day of March, A. D., 1964

Alfred J. Duck Clerk.

The State of Alabama }  
Baldwin County } Before me, ALICE J. DUCK, Clerk of Circuit Court,  
in and for said County, personally appeared I. Connor Owens, Jr.

who, being duly sworn, doth depose and say that Mary Campbell  
is indebted to Malbis Plantation, Inc., a corporation

indebted to XXXXXXX in the sum of Three Hundred Ten and no/100 Dollars,  
and that XXXXXXX ha commenced on suit by summons and complaint on said indebtedness  
against the said Mary Campbell

and that Vanity Fair Mills, Robertsdale, Alabama

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in its  
possession, or under its control, and that he believe that process of Garnishment against the said  
Vanity Fair Mills, Robertsdale, Alabama

is necessary to obtain satisfaction of said claim; and that the said Vanity Fair Mills  
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

Sworn to and subscribed before me this 8 day of June 19 64  
Alice J. Duck Clerk Circuit Court.

116  
No. 6082  
THE STATE OF ALABAMA  
Baldwin County.  
CIRCUIT COURT  
Plaintiff  
TO  
Defendant  
Bond and Affidavit in Garnishment  
on Summons  
Filed this 11 day of JUN, 19 64  
Clerk.  
Printed by Moore-Pg. Co.

**THE STATE OF ALABAMA,**  
BALDWIN COUNTY

**CIRCUIT COURT**

To Any Sheriff of the State of Alabama—Greeting:

Whereas, MALBIS PLANTATION, INC., a corporation

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

for the sum of THREE HUNDRED TEN AND NO/100 Dollars and whereas, the said Malbis Plantation, Inc., a corporation

has entered into bond, and made affidavit by law that the said Mary Campbell

is indebted to it in the sum of Three Hundred Ten

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 Vanity Fair Mills, Robertsdale, Alabama

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Vanity Fair Mills, Robertsdale, Alabama,

to be and appear within thirty days from the date hereof at the ~~xxxxxx~~ next term of the Circuit Court to

~~be held for the County of Baldwin on xx~~ \_\_\_\_\_, 1964  
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 garnishment 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 property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 8 day of June, 1964

E4-7-31-64

Alice J. Luck

Clerk.



No. 6082

Circuit Court of Baldwin County

Mallis Plantation  
Inc.

VS.

Garnishment On Summons

Mary Campbell

Unity Fair Mills  
R'dale - Garnishee

Issued FILED day of 19

JUN 8 1963

ALICE J. DUCK, CLERK  
REGISTER

Mashburn & Owen  
Plaintiff's Attorney

Received 8 day of June 1963  
d on 22 day of June 1963  
erved a copy of the within what  
Unity Fair Mills

service on Unity Fair Mills  
Mr. Pelham, Mgr.  
TAYLOR WILKINS, Sheriff  
By M. Costello D. S.  
Robertdale, Ala.

Owens & Mashburn  
request no action  
return

Received 31 day of July 1963  
nd on 31 day of July 1963  
served a copy of the within  
on Unity Fair Mills

by service on Mr. Pelham, Mgr.

TAYLOR WILKINS, Sheriff  
By M. Costello D. S.  
R'dale - Ala.

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY J. L.  
DEPUTY SHERIFF