

FIRST NATIONAL BANK OF BAY MINETTE,)	
A National Banking Association,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
vs.)	
)	AT LAW. NO. 6431
J. W. HAYLES,)	
)	
Defendant.)	

WRIT OF DISCOVERY:

TO: J. W. HAYLES
 Rabun Route, Bay Minette, Alabama

Take notice, that, Whereas, the Plaintiff in the above styled cause has requested, in writing, the undersigned, as Clerk of the Circuit Court of Baldwin County, Alabama, to issue notice to you, as Defendant, in said cause, and in the judgment therein, requiring you to file a statement in writing and under oath, of all of your assets, including money, choses in action, notes, bonds and accounts, and all other property, real, personal or mixed, or any interest therein, with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages or encumbrances thereon, showing the amounts due upon each and the owner and/or holder of such lien, and it appearing from the record in said cause that an execution was returned on the judgment in this cause endorsed "no property found" by the Sheriff of Baldwin County, Alabama.

NOW, THEREFORE, you are hereby required, within thirty (30) days from the service hereof, to file in this Court, a statement in writing, under oath, of all your assets, including money, choses in action, notes, bonds and accounts, and all other property real, personal or mixed, or any interest therein, with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages or encumbrances thereon, showing the amounts due upon each, and the owner or holder of such lien.

WITNESS my hand this 17 day of November, 1972.

Ernie B. Blackburn
 Clerk, Circuit Court of Baldwin County,
 Alabama.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to serve the foregoing notice upon J. W. HAYLES, Rabun Route, Bay Minette, Alabama,, the Defendant in said cause, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

WITNESS my hand this 17 day of November, 1972.

Eunice B. Blackmon
Clerk of Circuit Court of Baldwin County,
Alabama.

FILED

NOV 17 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

0431

WRIT OF DISCOVERY

FIRST NATIONAL BANK OF BAY MINETTE
A National Banking Association,

Plaintiff,

vs.

J. W. HAYLES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6431

RECEIVED

NOV 17 1972

TAYLOR WILKINS

clerk

FILED

NOV 17 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

J.C. Owens, Jr.
Att for Pety.

Shirley Clark 22
Ten Cents per mile Total \$ 2.40
TAYLOR WILKINS
BY Robert

17 Nov 72
and on 7 day of Dec 72
I served a copy of the Writ of Disc.
on J.W. Hayles

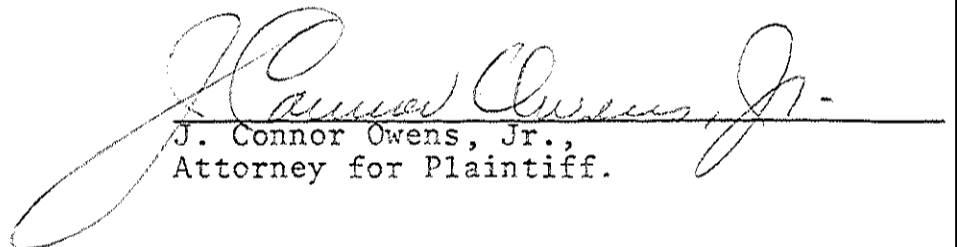
By service on

W. A. Zellert
Ralum

FIRST NATIONAL BANK OF BAY MINETTE,)		
a National Banking Association,)	IN THE CIRCUIT COURT OF	
Plaintiff,)		
vs.)	BALDWIN COUNTY, ALABAMA	
J. W. HAYLES,)		
Defendant.)	AT LAW.	NO. 6431

PETITION FOR DISCOVERY:

The Plaintiff herein having recovered on the 27th day of January, 1966, a judgment against the Defendant in the above styled cause for the sum of \$335.00, and costs, and such execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "no property found, the Plaintiff now requests in writing that the Clerk of this Court will issue a notice to the above named Defendant requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character, and description and wheresoever located as provided by Code 1940, Title 7, Section 903.


 J. Connor Owens, Jr.,
 Attorney for Plaintiff.

FILED

NOV 17 1972

EUNICE B. BLACKMON CIRCUIT CLERK

FIRST NATIONAL BANK OF BAY MINETTE, X
A National Banking Association,

Plaintiff

vs

J. W. HAYLES

Defendant

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW NO.

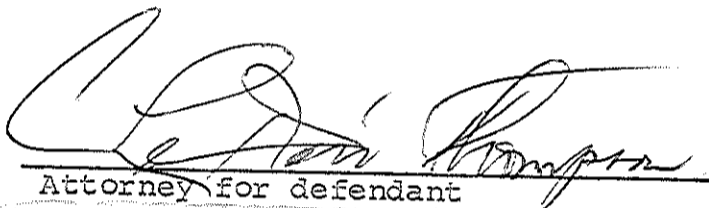
X

X

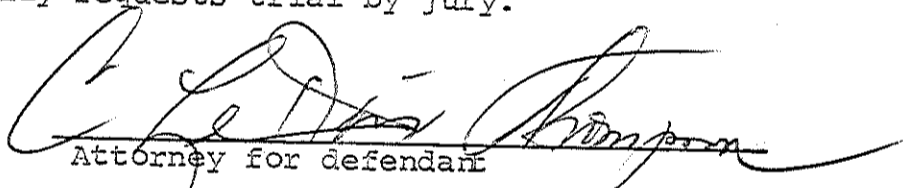
Comes the defendant in the above styled cause and for
demurrer to the complaint filed in said cause shows unto this
Honorable Court as follows:

-1-

That said complaint fails to state a cause of action.


Attorney for defendant

Defendant respectfully requests trial by jury.


Attorney for defendant

FILED

APR 9 1965

ALICE J. DUCK, CLERK,
REGISTER

FIRST NATIONAL BANK OF BAY MINETTE,)	
A National Banking Association,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
J. W. HAYLES,)	LAW SIDE.
)	
Defendant.)	

The Plaintiff claims of the Defendant, the sum of TWO HUNDRED NINETY ONE and 30/100 DOLLARS (\$291.30), due by Promissory Note made by him on August 31, 1964, and payable on November 30, 1964, together with interest thereon from date at the rate of eight percent (8%) per annum.

Plaintiff further alleges that in and by the terms of said note, the Defendant waived all rights of homestead under the Laws of the State of Alabama, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note the Defendant agreed to pay all costs of collection, including a reasonable attorney's fee, and Plaintiff claims the further and additional sum of Forty-three and 80/100 Dollars (\$43.80), as a reasonable attorney's fee in the premises.

FILED

MAR 12 1965

ALICE L. DICK, CLERK
REGISTER

J. Connor Owens, Jr.
J. Connor Owens, Jr.,
Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. W. HAYLES

RABUN ROUTE

PERDIDO, ALABAMA

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 _____

J. W. HAYLES

_____, Defendant

by THE FIRST NATIONAL BANK OF BAY MINETTE, a National Banking

Association,

_____, Plaintiff.....

Witness my hand this 12 day of March 1965

EX-3-18-65

Alice J. Duck clerk

No. 6431

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

The First National Bank of Bay Minette,
a National Banking Association

Plaintiffs

vs.

J.W. HAYLES

Defendants

SUMMONS and COMPLAINT

FILED

Filed, 19.....

MAR 12 1965

Clerk

**ALICE A. BIRCH, CLERK
REGISTER**

J. Connor Owens

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
RECEIVED IN OFFICE

MAR 15 1965, 19.....

TAYLOR WILKINS, Sheriff

I have ~~executed~~ ^{SHERIFF} this summons

this 18 March, 1965
by leaving a copy with

Sheriff claims 22 miles at

Ten Cents per mile Total \$2.20

TAYLOR WILKINS, Sheriff

BY W. O. Talbot
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. O. Talbot Deputy Sheriff

Ralston

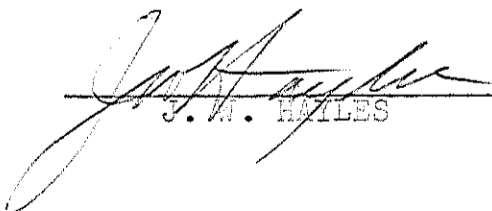
FIRST NATIONAL BANK OF BAY MINETTE)
A National Banking Association,)
Plaintiff) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
vs) AT LAW.
J. W. HAYLES,) NO. 6431
Defendant)

Now comes J. W. HAYLES, the defendant in the above styled cause, and in obedience to the notice heretofore served on him in this cause for a statement of his assets, and says;

I own a homstead situate on three acres of land on which an outstanding mortgage exist in the sum of \$11,000.00 plus interest to Baldwin County Bank; an equitable obligation is owed to the undersigned by Dewitt McGhee in the amount of \$1065.00. No notes or bonds owned by the defendant and there are no outstanding accounts. One 1971 Ford pickup truck of the value of \$1500.00 and there exist upon said truck a mortgage to Baldwin County Bank in excess of \$1500.00. Four used house trailers of the value of \$4000.00 and there exist upon said trailers a mortgage in the aggregate amount of \$4500.00 to the Baldwin County Bank and one additional trailer of the value of \$2000.00 with an existing mortgage to the First National Bank of Atmore in the amount of approximately \$2500.00.

Other outstanding debts are: Mobile Infirmary, \$908.00; Mobile General Hospital, \$618.00; Dr. Jerry Jordan, \$350.00; Dr. Billy Hightower, \$150.00; Dr. Daniels, \$105.00, Dr. Thomas, \$180.00.

Witness my hand and seal this the 28 day of December, 1972.


J. W. HAYLES

STATE OF ALABAMA
BALDWIN COUNTY

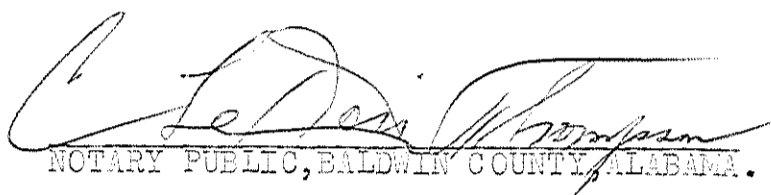
Before me the undersigned authority personally appeared J. W. Hayles, who is known to me and who being duly sworn, deposes

and says: That the foregoing facts are true and correct.

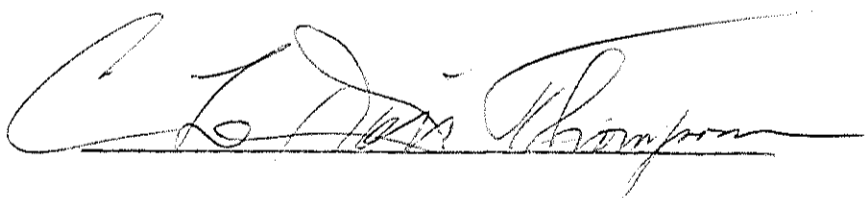

J. W. HAYLES

Sworn to and subscribed before me on this the 28
day of December, 1972.




NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

I hereby certify that I have this the _____ day of
December, 1972, served a copy of the foregoing on Honorable
J. Connor Owen, Attorney at Law, Bay Minette, Alabama,
Attorney for the Plaintiff, by depositing a copy of same
in the United States Mail, postage prepaid.



FILED

DEC 28 1972

EUNICE B. BLACKMON CIRCUIT
CLERK