

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
P. O. BOX 729
BAY MINETTE, ALABAMA

WALTER S. PATTON, ASSOCIATE

TELEPHONE NO. 937-4661

January 4, 1967

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Subject: J. E. Luenberg, Plaintiff,
vs.
M. M. Nelson, Defendant
Case No. 6785, Law

Dear Mrs. Duck:

This is to request that you please withdraw
my appearance as attorney for the defendant, M. M.
Nelson, in the above styled cause.

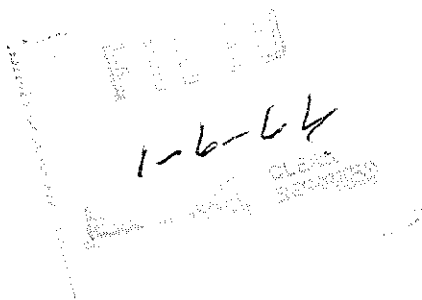
Thank you for your aid and consideration in
this matter.

Sincerely yours,



Walter S. Patton

WSP:am



J. E. LUENBERG,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	LAW SIDE. NO. 6785.
M. N. NELSON,)	
Defendant.)	

DEMURRER:

Now comes the Defendant in the above styled cause and demurs to the Complaint of the Plaintiff and to each count thereof, separately and severally, and as grounds for said demurrer, sets forth and assigns the following:

1. That said Complaint does not state a cause of action.

J. CONNOR OWENS, JR.,

By: Walter S. Patton
Walter S. Patton, Associate.
Attorney for Defendant.

I, the undersigned, Walter S. Patton, do hereby certify that I have this day mailed a copy of the foregoing demurrer to John V. Duck, Attorney for the Plaintiff in the within styled cause, through the United States Mail, properly addressed, postage prepaid.

Walter S. Patton

FILED
JAN 10 1966
ALICE I. DUCK, CLERK
REGISTER

J. E. LUENBERG,)
 Plaintiff,)
vs.)
M. M. NELSON,)
 Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

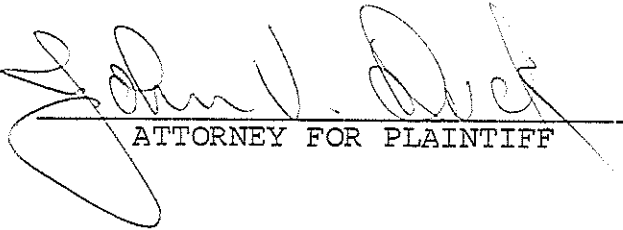
6785

Plaintiff claims of the Defendant the sum of SIXTY-FIVE (\$65.00) DOLLARS, the rent of a tract of land, viz, 201 White Avenue, Fairhope, Alabama, demised by the Plaintiff to the Defendant on the 21st day of March, 1965, and ending on the 21st day of December, 1965.

FILED

DEC 10 1965

ALICE J. DUCK, CLERK
REGISTER


ATTORNEY FOR PLAINTIFF

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 SummonM. M. NELSON

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.....

M. M. NELSON

....., Defendant.....

byJ. E. LUENBERG

....., Plaintiff.....

Witness my hand this.....10.....day of.....1965

.....Clerk

No. 6785

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

J. E. LUENBERG

Plaintiffs

vs.

M. M. NELSON

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

DEC 10 1965

Clerk

ALICE J. DUCK, CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
254 South Summit Street or
Poser Printing Company,
Fairhope, Alabama.

Received in Office

DEC 10 1965 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this Dec 16 1965
by leaving a copy with

M. M. Nelson

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY RR
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Roy Randal Deputy Sheriff

F. Kufe

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO

Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE

December 12, 1967

Re: Luenberg vs. M. M. Nelson

Civil No. 6785

Dear Mrs. Duck:

Enclosed please find Garnishment proceedings
to be filed in captioned case.

Sincerely,

John V. Duck
(18/11)

No. 6785

SIGNED

SIGNED

The State of Alabama,

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

OCTOBER

TERM, 1967

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular October Term, 1967, of the Circuit Court of Baldwin County, to-wit: On the 11th day of October, 1967, being a regular day of said term, J. E. LUENBERG

recovered judgment against M. M. NELSON

for the sum of SIXTY-FIVE AND NO/100 Dollars, and cost of suit,

and affidavit having been made by JOHN V. DUCK

that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

POSER PRINTING CO., INC.

Fairhope, Ala.

has or is believed to have in its possession, or under its control money or effects belonging to said defendant or that it is, or

is believed to be indebted to said defendant or to be liable to them, or to one of them 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.

You Are Therefore Hereby Commanded to Summon

POSER PRINTING CO., INC.

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, on the Monday in A. D. 1967, then and there within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the making its answer, or at any time intervening the time of serving the garnishment, and making the answer it was indebted to said defendant and whether it will not be indebted in future to said defendant

by a contract then existing, and whether by a contract then existing it is, or are, liable to said defendants 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 it has not in its possession or under its control money or effects belonging to the defendant M. M. NELSON

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 14 day of Dec, A. D., 1967

Issued 14 day of Dec, A. D., 1967

ATTEST:

Alice J. Duck, Clerk.

4-Dec 18-67

Received 14 day of Dec. 19 67

on 18 day of Dec. 19 67

Received a copy of the within Garn.
Poser Printing Co.

by service on Walter Poser Jr.
Vice Pres. J. H. H. H.
TAYLOR WILKINS, Sheriff
By Ray Randall

Sheriff claims 20 copies at
Ten Cents per mile Total \$ 1.00
TAYLOR WILKINS, Sheriff
BY Ray Randall
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 6785 1/2

J. E. Luenburg
VS. } GARNISHMENT ON JUDGMENT

M. M. Nelson

Issued _____ day of _____ 19 _____

Returnable _____ day of _____ 19 _____

John V. Leach
Attorney

STATE OF ALABAMA

Baldwin County

TO M. M. NELSON Defendant.....

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

J. E. LUENBERG Plaintiff.....

versus M. M. NELSON Defendant.....

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

POSER PRINTING CO., INC., Fairhope, Ala.....

has... been named as Garnishee.....

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

14 day of Dec., 1967

Clerk of the Circuit Court.

NO. 6785 1/2

Received 14 day of Dec. 1927
and on 18 day of Dec. 1927
I served a copy of the within Notice
on M. M. Nelson

By service on above
Taylor Wilkins
TAYLOR WILKINS, Sheriff
By Roy Randall D.S.

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

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

J. E. Lurenburg
Plaintiff....

VS.
M. M. Nelson
Defendant....

John W. Duck
att'y

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid JOHN V. DUCK

who being duly sworn, on oath says, that a regular October Term
of the Circuit Court of Baldwin County, to-wit: on the 11th day of October
19 67, J. E. LUENBERG

recovered a judgment against M. M. NELSON

SIXTY-FIVE AND NO/100 for the sum of
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
POSER PRINTING CO., INC., Fairhope, Ala.

supposed to be indebted to or have effects of the said M. M. NELSON
in its possession, or under its control, and that he believes process of
Garnishment against said M. M. NELSON
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 14
day of Dec A. D. 1967

Alice J. Duck
Clerk.

John V. Duck
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