

THE STATE OF ALABAMA {  
Baldwin County }

3277

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, Joseph S. Marsh,

T.M. Moss and Ralph B. Pierce

....., of the County of Baldwin Alabama

are held and firmly bound unto Otis Cooley and Marie Cooley

in the sum of Seven Hundred and No/100 Dollars, to

be paid to the said Otis Cooley and Marie Cooley

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 and severally, firmly by these presents.

Sealed with our seals and dated the June day of 1957

The Condition of this Obligation is such:

That whereas, the above bounden Joseph S. Marsh

..... ha.S., on the day of the date

hereof, prayed an Attachment at the suit of Joseph S. Marsh

..... against the estate of above named

Otis Cooley and Marie Cooley

for the sum of Three Hundred Fifty and No/100 Dollars,  
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said Joseph S. Marsh

should prosecute said Attachment to effect, and pay the said Defendant all such damages as they may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now, or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

x Joseph S. Marsh (Seal)

x T.M. Moss (Seal)

x Ralph B. Pierce (Seal)

x John E. Mandeville (Seal)

June 21st, 1957- I, the undersigned, do hereby certify that if this bond, as to Ralph B. Pierce of Saraland, Ala. were presented to me, I would approve same as

JOHN E. MANDEVILLE, CLERK, CIRCUIT COURT, MOBILE COUNTY, ALA.

Approved, this 24 day of June, 1957

John E. Mandeville, Clerk

THE STATE OF ALABAMA }  
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

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or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

x Joseph S. Marsh (Seal)x [Signature] (Seal)x [Signature] (Seal)

(Seal)

Approved, this \_\_\_\_\_ day of \_\_\_\_\_, 194\_\_\_\_\_

\_\_\_\_\_, Clerk

ATTACHMENT

The State of Alabama, {  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, JOSEPH S. MARSH

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that

OTIS COOLEY and MARIE COOLEY

is justly indebted to the Plaintiff JOSEPH S. MARSH

in the sum of Three Hundred Fifty and No/100 plus interest Dollars, and

JOSEPH S. MARSH having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
OTIS COOLEY and MARIE COOLEY

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be  
had by the Circuit Court of Baldwin County, Ala.. at a term thereof, to be held at the Court House of said  
County, on within thirty days ~~Monday~~ from date ~~xxxx~~  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this \_\_\_\_\_ day of June A. D., 19 57

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

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Baldwin County. }

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WHEREAS, JOSEPH S. MARSH

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that

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in the sum of Three Hundred Fifty and No/100 plus interest Dollars, and

JOSEPH S. MARSH having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of

OTIS COOLEY and MARIE COOLEY

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be  
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WITNESS, my hand, this \_\_\_\_\_ day of June A. D., 19 57

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

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Otis Cooley and Marie Cooley to appear and plead, answer or demur to the Bill of Complaint filed against them in the Circuit Court of Baldwin County, Alabama by Joseph S. Marsh within thirty days from the service hereof.

Herein fail not. Due return make of this writ as the law directs.

Witness this the 7th day of June, 1957.

JOSEPH S. MARSH,  
Plaintiff

vs.

OTIS COOLEY and  
MARIE COOLEY,  
Defendants

CLERK OF COURT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

ATTORNEY FOR PLAINTIFF

COUNT ONE:

The Plaintiff claims of the Defendants the sum of \$350.00 as the Assignee of a promissory note executed on, to-wit, June 15, 1956 by the Defendants and payable to the Merchants National Bank, Mobile, Alabama and assigned to the Plaintiff, which sum of money, together with the interest thereon, is still unpaid.

STATE OF ALABAMA     )  
BALDWIN COUNTY        )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Otis Cooley and Marie Cooley to appear and plead, answer or demur to the Bill of Complaint filed against them in the Circuit Court of Baldwin County, Alabama by Joseph S. Marsh within thirty days from the service hereof.

Herein fail not. Due return make of this writ as the law directs.

Witness this the 21<sup>st</sup> day of June, 1957.

*Alfred L. Welch*  
CLERK OF COURT

JOSEPH S. MARSH,  
Plaintiff

vs.

OTIS COOLEY and  
MARIE COOLEY,  
Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of \$350.00 as the Assignee of a promissory note executed on, to-wit, June 15, 1956 by the Defendants and payable to the Merchants National Bank, Mobile, Alabama and assigned to the Plaintiff, which sum of money, together with the interest thereon, is still unpaid.

*James H. Bailey*  
ATTORNEY FOR PLAINTIFF