

SUMMONS AND COMPLAINT

The State of Alabama { No. _____
Baldwin County

Circuit Court

Fall Term, 1917

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon M. Frank

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. Frank Defendant

by T. L. Moore Plaintiff

Witness my hand this 23rd day of July, 1917

[Signature] Clerk.

COMPLAINT

T. L. Moore

M. Frank,

Plaintiff Versus Defendant.

The plaintiff claims of the defendant

the sum of Eighty and 00/100 (\$80.00) Dollars due by from him by account on To-wit: March 2nd, 1917.

The Plaintiff claims of the defendant the sum of Eighty and 00/100 (\$80.00) Dollars on an account stated between the plaintiff and the defendant on the to-wit: March 2nd, 1917.

The Plaintiff claims of the defendant the sum of Eighty and 00/100 Dollars due for merchandise, goods and chattels sold by the plaintiff to the defendant on the to-wit: March 2, 1917, which sum of money together with interest due thereon is still due and unpaid.

80
00
6.00
1.00
7.00

PAGE & MOORE
Plaintiff's Attorney.

1st *Appointed*

No.

STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT

vs.

Plaintiffs

Defendants

SUMMONS AND COMPLAINT

Filed 191

Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

191

Sheriff

I have executed this Writ

this *Oct 17* 191 *2*

by leaving a copy of the within summons and complaint
with

M. Frank

W. E. Campbell Sheriff

Wm Thomas Deputy Sheriff

State of Alabama
Baldwin County.

Before me, Henry S. Moore, a Notary
Public in and for said County, in
said State, personally appeared
Charles Renvoir, who being by me
first duly and legally sworn
doth depose and say: That he is
personally acquainted with M.

Frank, and of his own knowledge
knows that the said M. Frank is
Not in the Military Service of the
United States Government, nor
in any wise in the Service of said
Government. Chas. Renvoir,

Sworn to and Subscribed before me May 20, 1918
Henry S. Moore Notary Public.

State of Alabama, }
Baldwin County

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, T. L. Moore

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

M. Frankfor the sum of Eighty and 00/100 Dollars and whereas, the saidT. L. Moore

has entered into bond, and made affidavit as required by law, that the said

M. Frank

is indebted to

him

in the sum of

Eighty

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 The Baldwin CountyBank

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said The Baldwin County Bankto be and appear at the nextterm of the Circuit Court, to be holden for the County of Baldwin, on November 1917,

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 23rd day of July, 1917


Clerk.

3rd *Amended*

No.

Circuit Court of Baldwin County.

VS. } Garnishment on Summons

Issued *24* day of *July* 191*7*

Filed July 24, 1917
W. H. Harrison
clerk

Plff's Attorney.

BALDWIN TIMES PRINT.

Ex rec'd 7/4/17
by receiving copy
of A. Harrison
Mr. D. Harrison
President Baldwin
County Bank
102 Boston

State of Alabama,

CIRCUIT COURT.

Baldwin County

To any sheriff of the State of Alabama-Greeting:

Whereas, T. L. Moore has commenced suit by summons and Complaint returnable to the Fall term of Circuit Court of said County, against M. Frank for the sum of Eighty and 00/100 Dollars and whereas, the said T. L. Moore has entered into bond, and made affidavit as required by law, that the said M. Frank is indebted to him in the sum of Eighty Dollars, and that process of garnishment is believed to be necessary to obtain of such judgment as may be recovered by Plaintiff, and that The Baldwin County Bank ~~and xxxxx~~ is believed to be chargeable as garnishee in the cause.

You are therefore, commanded to summon the said Baldwin County Bank to be and appear at the next term of the circuit court to be holden for the County of Baldwin, on November, 1917, then and there to answer, upon oath, whether, at the time of 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 the 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.

THESE ARE, THEREFORE TO COMMAND YOU, that you will notify Defendant of the issuance of said garnishment.

Witness my hand, this 19th day of November, 1917.


Clerk.

Executed by serving
a copy of the within
writ on Mr. Frank,
this 21st day of Nov.

1917,

E. E. Edwards

Deputy Sheriff

Deputy Sheriff

Filed 11/19/1917

J. W. Ferguson
Deputy

BOND.

State of Alabama, }
Baldwin County

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE,

H. M. Loomis & Boy Kin
John Covert

are held and firmly bound unto M. Frankin the sum of One Hundred Sixty and 00/100 (\$160.00) DOLLARS,to be paid to the said M. Frank, his

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 22nd day of July 1917.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound

T. L. Moore

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

to recover of said M. Frankthe sum of Eighty and 00/100 (\$80.00) Dollars,

and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

The Baldwin County Banksummoning it to answer what it is indebted to said Defendant, or what effects of said Defendant

it 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 he 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 we hereby severally certify that we

have property free from all incumbrance, to the full amount of the above bond.

[SEAL]

[SEAL]

[SEAL]

Approved this 23rd day of July, A. D., 1917.

Clerk.

Above named bondsmen are good and sufficient and would be accepted by me.
7/23/17
W. H. Harrison
County, Mobile Co., Ala

