

VE., B'KLYN 32, N. Y. PERSON ADDRESSED RETURN THIS COPY TO SENDER

R. A. HAIL, JR. JUSTICE OF THE PEACE P. O. Box 37 Robertsdale, Alabama

October 11, 1966

Honorable Alice J. Duck Circuit Clerk Baldwin County Bay Minette, Ala.

Dear Mrs. Duck;

I am mailing you Copys of my Civil Docket on Judgment Lanier P. Angle VS Robert Gerald Pope. I mailed Mr. Angle a judgment against Mr. Pope I did not have it recorded as he did not pay any costs of Court, and still has'nt.

I ran a Garnishment on Judgment and Notice to the defendent. The Officer that served the papers did not serve the proper papers He served the papers that should have been served on Defendent om South Baldwin Mills. I did not find this out until it was time to serve NISI on South Baldwin Mills.

I wrote to Mr. Angle that the error was made.

I have not heard from Mr. ANCLE since If he had wanted any thing done he could come in on any Friday and make up proper papers to be served. I am in my office on Fridays from 8;00 AM to Noon every week.

I have a hard time to get papers served as it is, and if I don't pay the Sheriff for what he has done, I don't get very good service.

Yours very truly, R. A. Hail, Jr.

Ps; I don't feel like taking money out of my pocket to pay for papers served by people who do not pay their just bills. Mr. Anle has made no payments to this date.

LANIER	P. ANGI	E,)	IN	THE	CIRCUIT	COURT	OF
		Plaintiff,)	BAI	DWIN	COUNTRY	ALABA	MA
vs.)	AT	law			
ROBERT	GERALD	POPE,	>					
		Defendant.)					

Comes now your Petitioner, ROBERT GERALD POPE, by and through his Attorney at Law, JOHN V. DUCK, and respectfully shows that on the 11th day of March, 1966, a Judgment was rendered against your Petitioner in a certain cause, wherein LANIER P. ANGLE is Plaintiff and your Petitioner is Defendant, for a sum unknown to your Petitioner, and costs, before R. A. HAIL, JR., a Justice of the Peace in and for said County and State.

Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney and the Attorney for the Plaintiff, agreed upon a sum to settle the said cause, and then and there, your Petitioner gave to the Attorney for the Plaintiff a check in the amount of FIFTY (\$50.00) DOLLARS as full settlement of the case.

Subsequent to said time, the time and place unknown to your Petitioner, the Plaintiff reappeared before the Justice, R. A. HAIL, JR., without notice to your Petitioner or his Attorney or without notice to the Plaintiff's Attorney, and then and there took Judgment which your Petitioner verily believes to be obtained through fraud.

Your Petitioner would further show that he was not apprised of the proof offered to substantiate the Judgment, and is under the information, knowledge and belief that the said Justice of the Peace, R. A. HAIL, JR., was not informed of the settlement of the cause between the Attorneys for the parties. The premises considered, your Petitioner prays that LANIER P. ANGLE be made a Party Defendant hereto and to this end, subpoena and all other needful process issue to him. That said R. A. HAIL, JR., Justice of the Peace as aforesaid, be required to send up to the Circuit Court of said County, all the records, papers and proceedings in said cause, and that he be required, commanded and directed to abstain from all further proceedings therein until the further order of said Circuit Court. And your Petitioner prays that upon a hearing of this Petition, that said Judgment be vacated, set aside and held for naught, and be declared as absolutely null and void.

And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.

STATE OF ALABAMA

BALDWIN COUNTY

1966.

Personally appeared before me, the undersigned authority, JOHN V. DUCK, and who being by me first duly and legally sworn, did depose and say on oath, that the matters and facts alleges in the foregoing Petition are true and correct according to his best knowledge and belief.

Sworn to and subscribed before me on this 22 day of August,

ung Higha

JOHN V. DUCK DUCK XFXLACEY Attorneys at Law P. O. DRAWER A-J - FAIRHOPE, ALABAMA

REPLY

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To Mrs. Alice J. Duck	DATE	
Bay Minette, Ala.		
DATE Oct. 22, 1966		
Re: Lanier P. Angle vs. Robert Gerald Pope		
Dear Mrs. Duck:		
The other day I forwarded you a Certiorari		
Bond in connection case thinking you had		
all of the other necessary papers, However,		
I discovered they were never sent to you		-
and am herewith enclosing same.		
Sincerely,	1. 	· · · · · · · · · · · · · · · · · · ·
A.D. II Duch		
John V. Mary		
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FORM AVAILABLE FROM GRAYARC CO., INC. 882 THIRD AVE., B'KLYN 32, N. Y.

THIS COPY FOR PERSON ADDRESSED

LANIER P. ANGLE,)	IN THE JUSTICE COURT OF
Plaintiff,	.)	R. A. HAIL, JR., JUSTICE
vs.)	OF THE PEACE, ROBERTSDALE,
ROBERT GERALD POPE,)	ALABAMA.
Defendant.)	

WRIT OF CERTIORARI TO R. A. HAIL, JR., JUSTICE OF THE PEACE, ROBERTSDALE, ALABAMA:

We being willing for certain causes to be certified of a certain cause pending before you wherein LANIER P. ANGLE is Plaintiff and ROBERT GERALDPOPE is Defendant, do therefore command you to send up to the present term of the Circuit Court of Baldwin County, Alabama, henceforth, all of the original papers in said cause, together with a statement signed by you of the said cause and the Judgment therein rendered by you, that we may further cause to be done thereupon what of right, according to the Constitution and Laws of this State ought to be done.

WITNESS my hand this the _____day of ______, 1966.

CLERK OF THE CIRCUIT COURT

Received in office the _____ day of _____, 1966.

Sheriff, Baldwin County, Alabama

Executed by serving a copy of the within on R. A. HAIL, JR, Justice of the Peace, Robertsdale, Alabama.

This the _____ day of _____, 1966.

SHERIFF

D.S.

LANIER P. ANGLI	3,)	IN THE JUSTICE COURT OF
Plaint:	iff,)	R. A. HAIL, JR., JUSTICE
VS.)	OF THE PEACE, ROBERTSDALE,
ROBERT GERALD I	POPE,)	ALABAMA.
Defenda	ant.)	

WRIT OF CERTIORARI TO R. A. HAIL, JR., JUSTICE OF THE PEACE, ROBERTSDALE, ALABAMA:

We being willing for certain causes to be certified of a certain cause pending before you wherein LANIER P. ANGLE is Plaintiff and ROBERT GERALDPOPE is Defendant, do therefore command you to send up to the present term of the Circuit Court of Baldwin County, Alabama, henceforth, all of the original papers in said cause, together with a statement signed by you of the said cause and the Judgment therein rendered by you, that we may further cause to be done thereupon what of right, according to the Constitution and Laws of this State ought to be done.

WITNESS my hand this the _____day of _____, 1966.

Received in office the ______, 1966.

Sheriff, Baldwin County, Alabama

Executed by serving a copy of the within on R. A. HAIL, JR, Justice of the Peace, Robertsdale, Alabama.

This the _____day of _____, 1966.

SHERIFF

CLERK OF THE CIRCUIT COURT

D. S.

LANIER P. ANGLE,)	IN THE JUSTICE COURT OF
Plaintiff,)	R. A. HAIL, JR., JUSTICE
vs.)	OF THE PEACE, ROBERTSDALE,
ROBERT GERALD POPE,)	ALABAMA.
Defendant.)	

ORDER FOR WRIT OF CERTIORARI

Upon Petitioner, ROBERT GERALD POPE, giving bond in the sum of ________dollars, conditioned and payable as required by law, the Clerk will issue the Writ of Certiorari prayed for.

DATED this the _____day of _____, 1966.

JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

LANIER P. ANGLE,) Plaintiff,) vs.) ROBERT GERALD POPE,) Defendant.)

IN THE JUSTICE COURT OF R. A. HAIL, JR., JUSTICE OF THE PEACE, ROBERTSDALE, ALABAMA.

ORDER FOR WRIT OF CERTIORARI

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DATED this the _____day of _____, 1966.

JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

LANIER P. ANGLE,)	IN THE CIRC	DIT COURT OF
Plaintiff,)	BALDWIN COU	NTY, ALABAMA
VS.)		
ROBERT GERALD POPE,)	А	
Defendant.)		
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TO ANY SHERIFF OF TH	IE STATE OF	ALABAMA, GREETING:	
		d to notify LANIER P.	
the day of_		. 1966	, a Writ of
Certiorari in the ab	ove stated (case was issued to R.	A. HAIL, JR.,
Justice of the Peace	, Robertsda	le, Alabama,	
You will ret	urn this Wr:	it according to law.	н. Стала стала ста Стала стала ста
WITNESS my h	and this the	day of	
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		CLERK OF THE CIRC	CUIT COURT
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SHERIFF			
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		SHERIFF	

LANIER P. ANGLE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
ROBERT GERALD POPE,)	
Defendant.)	
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the day of		, 1966, a Writ of
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Justice of the Peace, H	obertsdale, Alabam	a ,
You will return	this Writ accordin	ng to law.
WITNESS my hand	l this thed	ay of,
1966.		
	CLERI	K OF THE CIRCUIT COURT
Received in office the	······································	non a construction and a construction of the
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SHERIFF		
Executed by serving a c	opy of the within W	Writ on the day
of	, 1966.	

SHERIFF

LANIER	P. ANG	LE,)	IN	THE	CIRCUIT	COURT	OF
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vs.)	AT	law			
ROBERT	GERALD	POPE,)					
·		Defendant.)					

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Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney and the Attorney for the Plaintiff, agreed upon a sum to settle the said cause, and then and there, your Petitioner gave to the Attorney for the Plaintiff a check in the amount of FIFTY (\$50.00) DOLLARS as full settlement of the case.

Subsequent to said time, the time and place unknown to your Petitioner, the Plaintiff reappeared before the Justice, R. A. HAIL, JR., without notice to your Petitioner or his Attorney or without notice to the Plaintiff's Attorney, and then and there took Judgment which your Petitioner verily believes to be obtained through fraud.

Your Petitioner would further show that he was not apprised of the proof offered to substantiate the Judgment, and is under the information, knowledge and belief that the said Justice of the Peace, R. A. HAIL, JR., was not informed of the settlement of the cause between the Attorneys for the parties. The premises considered, your Petitioner prays that LANIER P. ANGLE be made a Party Defendant hereto and to this end, subpoena and all other needful process issue to him. That said R. A. HAIL, JR., Justice of the Peace as aforesaid, be required to send up to the Circuit Court of said County, all the records, papers and proceedings in said cause, and that he be required, commanded and directed to abstain from all further proceedings therein until the further order of said Circuit Court. And your Petitioner prays that upon a hearing of this Petition, that said Judgment be vacated, set aside and held for naught, and be declared as absolutely null and void.

And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, the undersigned authority, JOHN V. DUCK, and who being by me first duly and legally sworn, did depose and say on oath, that the matters and facts alleges in the foregoing Petition are true and correct according to his best knowledge and belief.

Sworn to and subscribed before me on this <u>77</u> day of August, 1966.

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						Witness	
Form J.P. 1001-5M-	-6-59-ROBERTS & SON, BERMINGHAM					=	

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LANIER P. ANGLE) IN THE CIRCUIT COURT OF Plaintiff, 3 BALDWIN COUNTY, ALABAMA vs.) ROBERT GERALD POPE Defendant.) TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING: You are hereby commanded to notify Lanier Palanglethat on the 7th day of October , 1966, a Writ of Certiorari in the above stated case was issued to R. A. Hail, Jr., Justice of the Peace, Pricinct No. 9. Baldwin County, Alabama. . You will return this Writ according to law. WITNESS my hand this the 7th day of October 1966. CLER Received in office the 7day of October, 1966. SHERIFF Executed by serving a copy of the within Writ on the day of_ ____, 1966. SHERIFF 113

 \Diamond 1066 leceived. ind on. 164 ...dav o served a copy of it within that $\mathcal{A}(\mathcal{A})$ y service on A TAXLOR WILKING Shoriff By Roy Randoll Lan Crecks ber mile Total 5. 7. TAYLOR WILKINS, Strentf, A 70 Roy Ra

10,7201

LANIER P. ANGLE, Plaintiff

Vs.

ROBERT GERALD POPE, Defendant

John V. Duck,

Atty

CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and <u>CULLEN S. GILMORE</u> and <u>GERTRUDE GILMORE</u>, are held and firmly bound unto LANIER P. ANGLE in the sum of <u>\$196.80</u> DOLLARS for the payment of which, well and truly to be made, we bind ourselves and each of us, our heirs, executors and administrators, jointly and severally.

The condition of the above obligation is such that whereas the said LANIER P. ANGLE has obtained a Judgment before the Honorable R. A. HAIL, JR., a Justice of the Peace for Precinct _______ of said county on the 11th day of March, 1966 against the said ROBERT GERALD POPE for Judgment in the amount of NINETY-EIGHT AND 40/100 (\$98.40) DOLLARS, concerning which Judgment the said ROBERT GERALD POPE has obtained a Writ of Certiorari returnable to the Circuit Court of said County for the removal of a certain Judgment rendered against her and in favor of LANIER P. ANGLE by R. A. HAIL, JR., a Justice of the Peace in and for said county:

NOW, THEREFORE, if the said ROBERT GERALD POPE shall pay such Judgment as may be rendered against him by the said Court to which cause is removed, then this obligation to be void; otherwise to remain in full force and effect.

APPROVED this the 6 day of

1966.

CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and CULLEN S. GILMORE and <u>GERTRUDE GILMORE</u>, are held and firmly bound unto LANIER P. ANGLE in the sum of \$196.80 DOLLARS for the payment of which, well and truly to be made, we bind ourselves and each of us, our heirs, executors and administrators, jointly and severally.

Sealed with our seals and dated the 4th day of October _____, 1966.

The condition of the above obligation is such that whereas the said LANIER P. ANGLE has obtained a Judgment before the Honorable R. A. HAIL, JR., a Justice of the Peace for Precinct of said county on the 11th day of March, 1966 against the said ROBERT GERALD POPE for Judgment in the amount of NINETY-EIGHT AND 40/100 (\$98.40) DOLLARS, concerning which Judgment the said ROBERT GERALD POPE has obtained a Writ of Certiorari returnable to the Circuit Court of said County for the removal of a certain Judgment rendered against her and in favor of LANIERSP. VANGLE by R. A. HAIL, JR., a Justice of the Peace in and for said county:

NOW, THEREFORE, if the said ROBERT GERALD POPE shall pay such Judgment as may be rendered against him by the said Court to which cause is removed, then this obligation to be void; otherwise to remain in full force and effect.

- Robert Bendd Pope____

APPROVED this the _____day_of___

1966.

CIRCUIT CLERK

TANTED	P. ANGLE,	N			FICE COURT (ت
LANLER	P. ANGLE, Plaintiff,				JR., JUSTI	
)			CE, ROBERTSI	
vs.					E, RUDERISI	, عيدمر
ROBERT	GERALD POPE,			ALABAMA.		
	Defendant.)				
		ORDER FOR	WRIT OF C	CERTIORARI		
	Upon Petitio	ner, ROBEI	RT GERALD	POPE, giving	g bond in th	he
sum of_				dollars	, conditione	ed and
payable	e as required	by law, th	ne Clerk v	vill issue th	ne Writ of	
Certior	ari prayed fo	er.				
	DATED this t	he	_day of		*	1966.
			JUDGE OF	THE CIRCUIT		DWIN
				COUNTY,	ALABAMA.	
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LANIER P. ANGLE,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.)
ROBERT GERALD POPE,)
Defendant.)
TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:
You are hereby commanded to notify LANIER P. ANGLE that on
the day of, 1966, a Writ of
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Justice of the Peace, Robertsdale, Alabama,
You will return this Writ according to law.
WITNESS my hand this theday of
1966.
CLERK OF THE CIRCUIT COURT
 Received in office the
day of, 1966.
SHERIFF
Executed by serving a copy of the within Writ on the day
of, 1966.
SHERIFF

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	LANIER P. ANGLE	IN THE JUSTICE COURT OF	
	Plaintiff	R. A. HAil, JJUSTICE OF	
	vs:		
		BEATALABAMA	×
	ROBERT GERALD POPE		
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	WRIT OF CERTIORARI TO R. A. Hail, Jr JI	USTICE OF THE PEACE OF BEAT 9	_
	Robertsdale , ALABAMA:		
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	We being willing for certain cause	as to be certified of a certain	
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	send up to the present term of the Circuit (Court of Baldwin County. Alabama.	
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	henceforth, all of the original papers in sa	ald cause, together with a state-	-
	ment signed by you of the said cause and the	e judgment therein rendered by	
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LANIER P. ANGLE, Plaintiff

VS.

ROBERT GERALD POPE, Defendant

John V. Duck, Atty

. . .

A COPY P IN THE JUSTICE COURT OF > LANTER P. ANGLE Plaintiff, J. A. DEDETHS, JUSTICE OF) BEAT 8, DARMA, ALABAMA 3 vs. 720.7201 ÷) ROBERT GERALD POPE Defendant.) ORDER FOR WRIT OF CERTIORARI Upon Petitioner, John V. Duck giving bond in the sum of Altre # 196.50 dollars, conditioned and payable as required by law, the Clerk will issue the Writ of Certiorari prayed for. DATED this the 7th day of Oclo 1966. A.M CIRCUIT COURT, BALD COUNTY, ALABAMA. 112

CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and CULLEN S. GILMORE

and <u>GERTRUDE GILMORE</u>, are held and firmly bound unto LANIER P. ANGLE in the sum of <u>\$196.80</u> DOLLARS for the payment of which, well and truly to be made, we bind ourselves and each of us, our heirs, executors and administrators, jointly and severally.

Sealed with our seals and dated the <u>4th</u> day of <u>October</u>, 1966.

The condition of the above obligation is such that whereas the said LANIER P. ANGLE has obtained a Judgment before the Honorable R. A. HAIL, JR., a Justice of the Peace for Precinct ______ of said county on the 11th day of March, 1966 against the said ROBERT GERALD POPE for Judgment in the amount of NINETY-EIGHT AND 40/100 (\$98.40) DOLLARS, concerning which Judgment the said ROBERT GERALD POPE has obtained a Writ of Certiorari returnable to the Circuit Court of said County for the removal of a certain Judgment rendered against her and in favor of LANIER P. ANGLE by R. A. HAIL, JR., a Justice of the Peace in and for said county:

NOW, THEREFORE, if the said ROBERT GERALD POPE shall pay such Judgment as may be rendered against him by the said Court to which cause is removed, then this obligation to be void; otherwise to remain in full force and effect.

1966.

Robert Serald Pope

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APPROVED this the $\underline{6}$ day of $\underline{100}$

LANIER P. ANGLE,)	IN THE JUSTICE COURT OF
Plaintiff,)	R. A. HAIL, JR., JUSTICE
vs.)	OF THE PEACE, ROBERTSDALE,
ROBERT GERALD POPE,)	ALABAMA.
Defendant.)	

WRIT OF CERTIORARI TO R. A. HAIL, JR., JUSTICE OF THE PEACE, ROBERTSDALE, ALABAMA:

We being willing for certain causes to be certified of a certain cause pending before you wherein LANIER P. ANGLE is Plaintiff and ROBERT GERALDPOPE is Defendant, do therefore command you to send up to the present term of the Circuit Court of Baldwin County, Alabama, henceforth, all of the original papers in said cause, together with a statement signed by you of the said cause and the Judgment therein rendered by you, that we may further cause to be done thereupon what of right, according to the Constitution and Laws of this State ought to be done.

WITNESS my hand this the _____day of ______

CLERK OF THE CIRCUIT COURT

Rece	eived	in	office	the		
day	of				,	1966.

Sheriff, Baldwin County, Alabama

Executed by serving a copy of the within on R. A. HAIL, JR, Justice of the Peace, Robertsdale, Alabama. This the _____ day of ______, 1966.

SHERIFF

D. S.

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LANIER P. ANGLE, .) IN THE CIRCUIT COURT OF Plaintiff,) BALDWIN COUNTY, ALABAMA vs.) AT LAW ROBERT GERALD POPE,) Defendant.)

Comes now your Petitioner, ROBERT GERALD POPE, by and through his Attorney at Law, JOHN V. DUCK, and respectfully shows that on the 11th day of March, 1966, a Judgment was rendered against your Petitioner in a certain cause, wherein LANIER P. ANGLE is Plaintiff and your Petitioner is Defendant, for a sum unknown to your Petitioner, and costs, before R. A. HAIL, JR., a Justice of the Peace in and for said County and State.

Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney and the Attorney for the Plaintiff, agreed upon a sum to settle the said cause, and then and there, your Petitioner gave to the Attorney for the Plaintiff a check in the amount of FIFTY (\$50.00) DOLLARS as full settlement of the case.

Subsequent to said time, the time and place unknown to your Petitioner, the Plaintiff reappeared before the Justice, R. A. HAIL, JR., without notice to your Petitioner or his Attorney or without notice to the Plaintiff's Attorney, and then and there took Judgment which your Petitioner verily believes to be obtained through fraud.

Your Petitioner would further show that he was not apprised of the proof offered to substantiate the Judgment, and is under the information, knowledge and belief that the said Justice of the Peace, R. A. HAIL, JR., was not informed of the settlement of the cause between the Attorneys for the parties. The premises considered, your Petitioner prays that LANIER P. ANGLE be made a Party Defendant hereto and to this end, subpoena and all other needful process issue to him. That said R. A. HAIL, JR., Justice of the Peace as aforesaid, be required to send up to the Circuit Court of said County, all the records, papers and proceedings in said cause, and that he be required, commanded and directed to abstain from all further proceedings therein until the further order of said Circuit Court. And your Petitioner prays that upon a hearing of this Petition, that said Judgment be vacated, set aside and held for naught, and be declared as absolutely null and void.

And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.

PETITIONER

STATE OF ALABAMA BALDWIN COUNTY

Personally appeared before me, the undersigned authority, JOHN V. DUCK, and who being by me first duly and legally sworn, did depose and say on oath, that the matters and facts alleges in the foregoing Petition are true and correct according to his best knowledge and belief.

AFFIANI

Sworn to and subscribed before me on this 22 day of August,

1966.

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