

SPEED LETTER

JOHN V. DUCK
~~DUCK & LACEY~~

Attorneys at Law
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE

DATE October 4, 1966

Dear Mrs. Duck:

Re: Lanier P. Angae vs. Robert Gerald Pope

Dear Mrs. Duck:

Enclosed is Certiorari Bond in connection
with captioned case. Please issue the
Writ of Certiorari.

Sincerely,

John V. Duck
(24)

SIGNED

SIGNED

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.

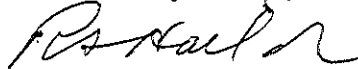
I ran a Garnishment on Judgment and Notice to the defendent.
The Officer that served the papers did not serve the proper papers
He served the papers that should have been served on Defendent om
South Baldwin Mills. I did not find this out until it was time to
serve NISI on South Baldwin Mills.

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

I have not heard from Mr. ANGLE 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. 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.

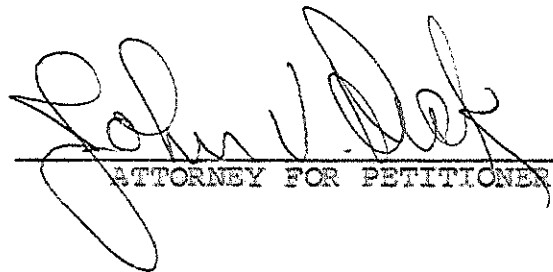
Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney 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.

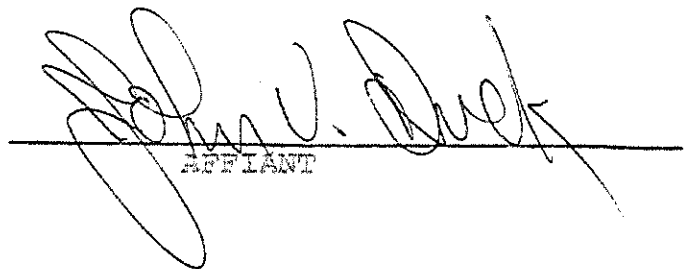
And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.


ATTORNEY FOR 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.


AFFIANT

Sworn to and subscribed before
me on this 22 day of August,
1966.


NOTARY PUBLIC

SPEED LETTER

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

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck
 Bay Minette, Ala.

DATE

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,

John V. Duck
 (JVD)

SIGNED

SIGNED

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

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

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 Plain-
tiff and ROBERT GERALD POPE 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. 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

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

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 CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

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
Certiorari in the above stated case was issued to R. A. HAIL, JR.,
Justice of the Peace, Robertsdale, Alabama,

You will return this Writ according to law.

WITNESS my hand this the _____ day 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

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

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

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
Certiorari in the above stated case was issued to R. A. HAIL, JR.,
Justice of the Peace, Robertsdale, Alabama,

You will return this Writ according to law.

WITNESS my hand this the _____ day 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

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.

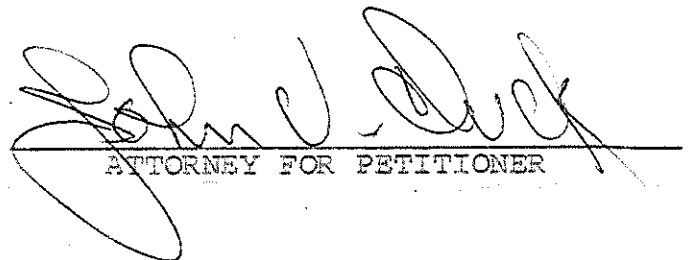
Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney 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.

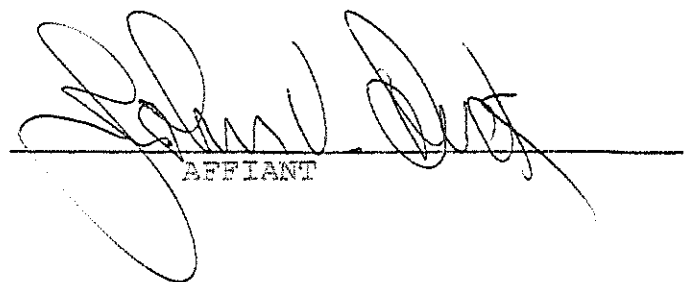
And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.


ATTORNEY FOR PETITIONER

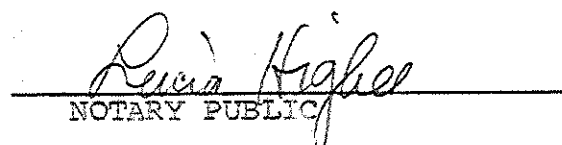
STATE OF ALABAMA

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.


AFFIANT

Sworn to and subscribed before
me on this 27 day of August,
1966.


NOTARY PUBLIC

County, Alabama

BEAT No.

CASE No. _____

15385

[illegible]

AMOUNT

Issuing Summons		50
Subpoena for each Witness15	
Execution and Taxing Cost50	
Attachment Bond and Affidavit	1.50	
Docketing each Cause10	10
<i>Indant</i>		75
<hr/>		
CONSTABLES' FEES (Title 11 * 39 Justices' Code)		
Serving Summons50	
Serving Summons on each Witness25	
Levying Attachment		
Levying Execution		
Making Money on Execution		
<hr/>		
SHERIFF'S FEES (Title 11 * 34 Justices' Code) (Constables' Fees when Amount in Controversy Is \$20.00 or More)		
Serving Summons	1.50	150
Serving Summons on each Witness75	
Collecting Execution for Cost Only	1.50	
Collecting Money Under Execution		
<i>mileage</i>	10	100
<hr/>		
WITNESS' FEES (Title 13 * 415 Justices' Code)		
..... Days at .50		
..... Days at .50		
..... Days at .50		
<hr/>		
Justice of the Peace		
Constable		
Sheriff		
Witness		
<hr/>		

JUSTICE

Copy

BEAT No. _____

CASE No. 154/15

ATTORNEYS	CASE	WITNESSES	DATE	DISPOSITION OF CASE
	Lester P Engle	FOR PLAINTIFF	5/26/66	11 am
		Wrong papers served on South Baddam Mills officer in error		May 18, 1966
	VS. Robert Gerald Pope	Serving Papers Served Papers Served on South Baddam Mills		
	South Baddam Mills Garnish	Were not served at all - were found in Police Car in sum		
	CAUSE FOR ACTION	FOR DEFENDANT		
	Judgment Notice to defendant in Garnishment	The papers sent on South Baddam Mills was NOTICE TO DEFENDANT IN GARNISHMENT SHOULD HAVE SERVED GARNISHMENT ON JUDGMENT WRIT		
	Garnishment on Judgment	I CAN'T HOLD THE OFFICERS HAND AND TELL HIM HOW TO SERVE PAPER'S		

[illegible][illegible]

LANIER P. ANGLE

Plaintiff,

vs.

ROBERT GERALD POPE

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to notify Lanier P. Angle that on the 7th day of October, 1966, a Writ of Certiorari in the above stated case was issued to R. A. Hall, Jr., Justice of the Peace, Precinct No. 9, Baldwin County, Alabama.

You will return this Writ according to law.

WITNESS my hand this the 7th day of October, 1966.

W. J. Hall
CLERK OF THE CIRCUIT COURT

Received in office the 7
day of October, 1966.

SHERIFF

Executed by serving a copy of the within Writ on the _____ day
of _____, 1966.

SHERIFF

no. 7201

LANIER P. ANGLE,
Plaintiff

Vs.

ROBERT GERALD POPE,
Defendant

received 7 day of Oct. 1966
and on 10 day of Oct. 1966
served a copy of the writ in Notice
Lanier P. Angle
V. Pope
by service on same

TAYLOR WILKINS, Sheriff

by Roy Randall

Deputy Sheriff 70

Law Costs per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Roy Randall
DEPUTY SHERIFF

John V. Duck,
Atty

CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and CULLEN S. GILMORE
and GERTRUDE GILMORE, 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 our-
selves 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 Honor-
able 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.

Robert Gerald Pope

Cullen S. Gilmore

Gertrude Gilmore

APPROVED this the 6 day of Oct

1966.

Reice J. Haskins
CIRCUIT CLERK

CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and CULLEN S. GILMORE
and GERTRUDE GILMORE, 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 our-
selves 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 Honor-
able 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.

Robert Gerald Pope

Cullen S. Gilmore

Gertrude Gilmore

APPROVED this the _____ day of _____
1966.

CIRCUIT CLERK

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 CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

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
Certiorari in the above stated case was issued to R. A. HAIL, JR.,
Justice of the Peace, Robertsdale, Alabama,

You will return this Writ according to law.

WITNESS my hand this the _____ day 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

LANIER P. ANGLE

Plaintiff

vs:

ROBERT GERALD POPE

Defendant.

IN THE JUSTICE COURT OF

R. A. Hail, Jr, JUSTICE OF

BEAT _____, _____ ALABAMA

WRIT OF CERTIORARI TO R. A. Hail, Jr JUSTICE OF THE PEACE OF BEAT 9
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 GERALD POPE 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 7th day of October, 1966.

Prince J. Smith
CLERK OF THE CIRCUIT COURT

Received in office the 7
day of October, 1966.

SHERIFF, Baldwin County, Alabama

Executed by serving a copy of the within on _____ JUSTICE OF
THE PEACE, BEAT _____, Baldwin County, Alabama.

This the _____ day of _____, 1966.

SHERIFF

DEPUTY SHERIFF

7201

LANIER P. ANGLE,
Plaintiff

VS.

ROBERT GERALD POPE,
Defendant

Received 7 day of Oct 1966
and on 18 day of Oct 66
served a copy of the within Writ.
on R.A. Hail Jr.
y service on _____

TAYLOR WILKINS, Sheriff

By [Signature]

RACU

Sheriff claims 50 miles
Ten Cents per mile Total \$5.00
TAYLOR WILKINS, Sheriff
BY Charles [Signature]
DEPUTY SHERIFF

John V. Duck,
Atty

LANIER P. ANGLE
Plaintiff,

vs.

ROBERT GERALD POPE

Defendant.

IN THE JUSTICE COURT OF

J. A. BEEBING, JUSTICE OF

BEAT 8, DIXIE, ALABAMA

NO. 7201

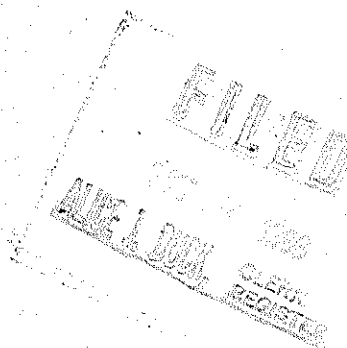
ORDER FOR WRIT OF CERTIORARI

Upon Petitioner, John V. Duck, giving bond in the sum
of ~~\$4000.00~~ \$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 October

1966.

Julius A. Maslurn
JUDGE OF CIRCUIT COURT, BALDWIN
COUNTY, ALABAMA.



CERTIORARI BOND

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, ROBERT GERALD POPE and CULLEN S. GILMORE
and GERTRUDE GILMORE, 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 our-
selves 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 Honor-
able 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.

Robert Gerald Pope

Cullen S. Gilmore

Gertrude Gilmore

APPROVED this the 6 day of Oct

1966.

Alfred J. Smith
CIRCUIT CLERK

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

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

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 Plain-
tiff and ROBERT GERALD POPE 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. ANGLE,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
ROBERT GERALD POPE,)	
Defendant.)	

no. 7201

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.

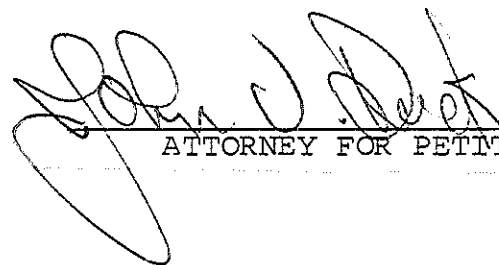
Petitioner avers that on the date set for the hearing of said cause, that your Petitioner along with his Attorney, appeared, along with the Plaintiff and his Attorney, and that the said Justice of the Peace was not in his office and holding Court, and that at said time and place, your Petitioner's Attorney 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.

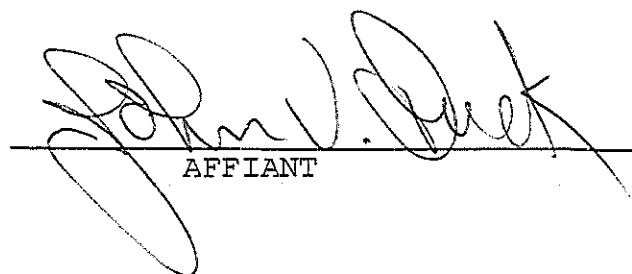
And Petitioner prays for such other, further and different relief as the facts and equities of the case may require.


ATTORNEY FOR 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.


AFFIANT

Sworn to and subscribed before
me on this 22 day of August,
1966.


NOTARY PUBLIC