

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7460

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLARD BROWN

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

WILLARD BROWN

Defendant

by BALDWIN COUNTY BANK, A Corp.

Plaintiff

Witness my hand this 11th day of April 19 67

Alice J. Clark Clerk

## STATE OF ALABAMA

Baldwin County

## CIRCUIT COURT

BALDWIN COUNTY BANK,

A Corporation

Plaintiffs

vs.

WILLARD BROWN

Defendants

## SUMMONS AND COMPLAINT

Filed April 11, 1967

Alice J. Duck Clerk

Wilson Hayes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

APR 12 1967  
Received in OfficeTAYLOR WILKINS  
SHERIFF

19

Sheriff

I have executed this summons

this April 19, 1967

by leaving a copy with

Willard Brown

Sheriff claims 20

Ten Cents per mile Total \$2.00

TAYLOR WILKINS

Sheriff

BY

W. A. Talbot

DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

White house rent

BALDWIN COUNTY BANK,  
A CORPORATION,  
  
PLAINTIFF  
  
VS  
  
WILLARD BROWN  
  
DEFENDANT

) IN THE CIRCUIT COURT  
)  
) BALDWIN COUNTY, ALABAMA  
)  
) AT LAW  
)  
) NUMBER: 7460  
)  
)  
)

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I

THE PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF ONE-  
HUNDRED FIFTY-THREE AND NO/100 (\$153.00) DOLLARS, DUE BY PROMISSORY  
NOTE MADE BY HIM ON THE 16TH DAY OF APRIL, 1966 AND PAYABLE ON  
THE 20TH DAY OF MAY 1966 WITH INTEREST THEREON.

THE NOTE CONTAINS PROVISION FOR A REASONABLE ATTORNEY'S  
FEE AND WAIVER OF EXEMPTION WHEREOF PLAINTIFF CLAIMS BENEFIT.

  
\_\_\_\_\_  
ATTORNEY FOR PLAINTIFF

DEFENDANT MAY BE  
FOUND AT ROUTE I,  
BOX 272  
BAY MINETTE, ALABAMA

FILED

APR 11 1967

ALICE L. BIRN, CLERK  
REGISTER

NUMBER: \_\_\_\_\_

BALDWIN COUNTY BANK  
A CORPORATION

PLAINTIFF

VS

WILLARD BROWN

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

FILED

APR 11 1981

AND J. H. H. CLERK  
AND J. H. H. DEPUTY

BALDWIN COUNTY BANK  
a Corporation

PLAINTIFF

VS

WILLARD BROWN

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
NUMBER: 7460

MOTION FOR WRIT OF DISCOVERY

TO THE HONORABLE ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA:

WHEREAS, IN THE ABOVE STYLED CAUSE THE PLAINTIFF RECOVERED A JUDGEMENT AGAINST THE SAID DEFENDANT, Willard Brown ON THE 5th DAY OF October, 1967, FOR THE SUM OF \$ 193.00 BESIDES THE COST OF SAID CAUSE; WHEREAS EXECUTION WAS ISSUED ON THE SAID JUDGEMENT AGAINST THE SAID Willard Brown, AND THEREAFTER THE SAID EXECUTION WAS RETURNED BY THE SHERIFF OF BALDWIN COUNTY, ALABAMA WITH THE ENDORSEMENT THEREON "NO PROPERTY FOUND" AND THE SAID JUDGEMENT REMAINS UNPAID AND UNSATISFIED,

NOW THEREFORE, THIS IS TO REQUEST YOU AS CLERK OF SAID COURT TO ISSUE A NOTICE TO THE SAID Willard Brown REQUIRING him TO FILE IN THE CIRCUIT COURT OF SAID COUNTY, WITHIN 30 DAYS FROM THE SERVICE OF SAID NOTICE, A STATEMENT IN WRITING, UNDER OATH, OF ALL OF THE ASSETS OF THE SAID Willard Brown INCLUDING MONEY, CHOSSES IN ACTION, BONDS AND ACCOUNTS, AND ALL OTHER PROPERTY, REAL, PERSONAL OR MIXED OR ANY INTEREST THEREIN, WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED STATEMENT OF ALL LIENS, MORTGAGES OR ENCUMBRANCES THEREON, SHOWING THE AMOUNTS DUE UPON EACH, AND OWNER OR HOLDER OF SUCH LIENS, MORTGAGES OR ENCUMBRANCES.

THE SAID Willard Brown RESIDES AT Route 1, Box 272, Bay Minette IN THE COUNTY OF Baldwin STATE OF ALABAMA.

DATED THIS 22nd DAY OF August, 1968.

FILED

AUG 27 1968

Willard Brown  
ATTORNEY FOR PLAINTIFF

ALICE J. DUCK CLERK  
REGISTER

70. 746 D

Baldwin County Bank

DS

Willard Brown

Recovery of assets

W. Hayes

BALDWIN COUNTY BANK  
a Corporation

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

PLAINTIFF

VS

NUMBER: 7460

WILLARD BROWN

DEFENDANT

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: Willard Brown

TAKE NOTICE, WHEREAS, THE PLAINTIFF HEREIN HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF THIS COURT, TO ISSUE NOTICE TO YOU AS DEFENDANT HEREIN, REQUIRING YOU TO FILE A STATEMENT, IN WRITING, UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN TITLE 7, SECTION 903, ALABAMA CODE 1940, AS AMENDED AND IT APPEARING FROM THE SAID REQUEST AND THE RECORD IN THE SAID CAUSE THAT AN EXECUTION WAS RETURNED ON THE JUDGEMENT IN THIS CAUSE ON THE 29 DAY OF Nov, 1967, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA,

NOW THEREFORE YOU THE SAID Willard Brown ARE HEREBY REQUIRED, WITHIN 30 DAYS FROM THE SERVICE HEREOF, TO FILE IN THIS COURT A STATEMENT, IN WRITING, UNDER OATH OF ALL YOUR ASSETS, INCLUDING MONEY, CHOSES IN ACTION, NOTES, BONDS AND ACCOUNTS, AND ALL OTHER PROPERTY, REAL, PERSONAL, OR MIXED, OR ANY INTEREST THEREIN WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED LIST OF STATEMENTS, OR ANY AND ALL LIENS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS THE 27 DAY OF Aug, 1968

Reice J. Quack

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED Willard Brown AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Reice J. Quack  
CLERK

39629  
40066

7460

Baldwin Co. Bank

15

Willard Brown

Removal of assets

W. H. Ayer

Given 27 day of Aug 1968  
on 27 day of Aug 1968  
received a copy of the within of  
Willard Brown

Service on

TAYLOR WILKINS, Sheriff

By W. A. Talbot

White house Fork