

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Joe Lewis Jones

.....
.....
.....

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.....

..... Joe Lewis Jones Defendant.....

by

....., Plaintiff.....

Witness my hand this..... day of..... 1967

Wanted

6-15-67

Allice J. Luck

..... Clerk

No. 2482

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

AUTOMOBILE DISCOUNT CENTER
Plaintiffs

vs.

JOE LEWIS JONES
Defendants

SUMMONS AND COMPLAINT

FILED

Filed APR 20 1967 19.....

Alice J. Dick, CLERK, REGISTER

Clerk

W. H. Hars, Plaintiff's Attorney

Defendant's Attorney

R7. 1 B47 Daphne

Defendant lives at

Staworth Charters

RECEIVED

Received In Office

APR 20 1967

19.....

TAYLOR WILKINS

SHERIFF

, Sheriff

I have executed this summons

this June 15 19 67
by leaving a copy with

Joe Lewis Jones

Joe Lewis Jones

Wobles

Sheriff claims 40 miles at

For County per mile total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Roy Randall
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Roy Randall, Deputy Sheriff

AUTOMOBILE DISCOUNT CENTER
INC., A Corporation,

Plaintiff,

vs.

JOE LEWIS JONES,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

7487

1.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FORTY-FIVE and 00/100 DOLLARS (\$245.00), balance due after all proper credits given on the promissory note made by the Defendant on January 20, 1967, and payable in twenty-four (24) monthly installments of \$10.00 each, the first payment due and payable January 28, 1967 and one last payment of \$5.00. The Plaintiff avers that the Defendant defaulted on the first payment, and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff claims interest at the rate of 8% per annum from January 28, 1967. The Plaintiff further avers that the Defendant agreed in the promissory note to pay all expenses and reasonable attorneys fees incurred in collecting the same and the Plaintiff claims a reasonable attorneys fee in the amount of \$50.00.

FILED

APR 20 1967

ALICE L. DUCK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Hughes S. Nesbit

Joe Lewis Jones lives Rt. 1, Box 1, Daphne, Alabama

STATE OF ALABAMA

Baldwin County

TO Joe Lewis Jones, Defendant.....:

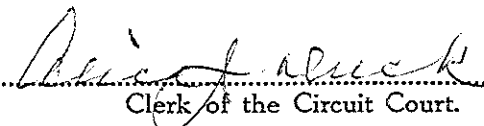
YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of..

Automobile Discount Center, Inc., a Corporation, Plaintiff.....versus Joe Lewis Jones, Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama. Law Side, in which

Spanish Fort Plumbing Companyhas^S been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the

.....day of August, 1967
Clerk of the Circuit Court.

AUTOMOBILE DISCOUNT CENTER, INC.,
a Corporation

PLAINTIFF

VS

JOE LEWIS JONES

DEFENDANT

SPANISH FORT PLUMBING
COMPANY

GARNISHEE

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NUMBER: 7487½

Comes now Spanish Fort Plumbing Company and for answer to
the Garnishment herein filed say:

1. Joe Lewis Jones is not employed by it.
2. It is not indebted to Joe Lewis Jones and does not
expect to be indebted to him hereafter.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared
Wilson Hayes, who is known to me, and who, being by me first duly
sworn, deposes and says that he has read the foregoing instrument
and that the facts therein stated are true and correct according
to information and belief.

Wilson Hayes

Subscribed and sworn to before me on this the 2nd
day of October, 1967.

Ruth K. Howell
Notary Public,

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 2nd day of October
1967 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.

The State of Alabama,

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 1967....., of the Circuit Court of Baldwin County, to-wit: On the 3rd day of August, 1967., being a regular day of said term, AUTOMOBILE DISCOUNT CENTER, INC., A CORPORATION.....

recovered judgment against

JOE LEWIS JONES

for the sum of THREE HUNDRED AND 00/100 Dollars, and cost of suit, and affidavit having been made by Phyllis S. Nesbit, attorney for Plaintiff, that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Spanish Fort Plumbing Company

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Joe Lewis Jones or that it is, or is believed to be indebted to said defendant or to be liable to them, or to one of them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

You Are Therefore Hereby Commanded to Summon

Spanish Fort Plumbing Company

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, within thirty days of service of this writ ~~in the City of Bay Minette on the 1st day of September 1967~~ A.D. 1967, and there, within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the making its answer, or at any time intervening the time of serving the garnishment, and making the answer it was indebted to said defendant Joe Lewis Jones and whether it will not be indebted in future to said defendant

by a contract then existing, and whether by a contract then existing is, or are, liable to said defendants 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 it has not in its possession or under its control money or effects belonging to the defendant Joe Lewis Jones

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 24th day of August, A. D., 1967.

Issued 24 day of August, A. D., 1967.

ATTEST:

185 Alice J. Duck, Clerk.

Served 24 day of Aug 1967
d on 5 day of Sept 1967

Served a copy of the within Warrant
Spirit-Don Plumbing

Service on J. C. Bethany
owner
TAYLOR WILKINS, Sheriff
By Ray Randall

Sheriff claims 44 miles at
Ten Cents per mile Total \$4.40
TAYLOR WILKINS, Sheriff
BY Ray Randall
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 7487 1/2

Automobile Discount

VS. } GARNISHMENT ON JUDGMENT

for Lewis Jones

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Robert
Attorney

STATE OF ALABAMA

Baldwin County

TO Joe Lewis Jones, Defendant.....:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of..
Automobile Discount Center, Inc. a Corporation....., Plaintiff.....
versus Joe Lewis Jones....., Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which
Spanish Fort Plumbing Company.....

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the
.....day of August, 1967

Reid Owen
Clerk of the Circuit Court.

184

Ex. 9-5-67

(Mailed address unknown)

Received 24 day of Aug 1967

and on _____ day of _____

I served a copy of the within notice

on Joe Lewis Jones

By service on _____

TAYLOR WILKINS, Sheriff

By _____

Deputy Sheriff

By Ray Kinard
Taylor Wilkins, Sheriff

Not found in my county after diligent search and I

Returned 5 day of Sept 1967

770.7487 1/2

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

...Automobile Discount...

...Center, Inc., a Corporation...

Plaintiff....

VS.

Joe Lewis Jones

Defendant....

noted

THE STATE OF ALABAMA
Baldwin County

7487 1/2
Circuit Court

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State
aforesaid Phyllis S. Nesbit, Attorney for Automobile Discount Center, a Corp.

who being duly sworn, on oath says, that a regular Term

of the Circuit Court of Baldwin County, to-wit: on the 3rd day of August
19.67, Automobile Discount Center, Inc., a Corporation

recovered a judgment against Joe Lewis Jones

THREE HUNDRED AND 00/100 for the sum of

..... Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

Spanish Fort Plumbing Company

supposed to be indebted to or have effects of the said Joe Lewis Jones

in its possession, or under its Control, and that he believes process of

Garnishment against said Spanish Fort Plumbing Company

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 24

day of Aug A. D. 19.67

Alice J. Duck
Clerk.

Phyllis S. Nesbit

NO. 7487 1/4

Circuit Court

AUTOMOBILE DISCOUNT CENTER,
INC., A CORPORATION

VS.

JOE LEWIS JONES

AFFIDAVIT
GARNISHMENT ON JUDGMENT

Filed this day of
..... 19.....

Clerk.

MOORE PRINTING CO. - BAY MINETTE, ALA.