

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. F. Brown to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Baldwin County Bank, a corporation.

WITNESS my hand this 27 day of April, 1967.

Alvin J. Muck  
Clerk

\* \* \* \* \*

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

720.7493

C O M P L A I N T


COUNT ONE

The plaintiff claims of the defendant Nine Thousand Five Hundred and no/100 Dollars (\$9500.00) due by a promissory note made by him on July 30, 1962, and payable on the 30th day of January, 1963, together with interest thereon since May 28, 1965. Plaintiff avers that in and by the terms of the said note the defendant agreed to pay all costs of collecting or securing or attempting to collect or secure the said note, including a reasonable attorney's fee, which said fee the plaintiff avers to be \$1,000.00 and which it herewith claims.

COUNT TWO

The plaintiff claims of the defendant Nine Thousand Five Hundred and no/100 Dollars (\$9500.00) due by a promissory note made by him on February 11, 1963, and payable on the 11th day of August,

1963, with interest thereon since May 28, 1965. Plaintiff avers that in and by the terms of the said note the defendant agreed to pay all costs of collecting or securing or attempting to collect or secure the said note, including a reasonable attorney's fee, which said fee the plaintiff avers to be \$1,000.00 and which it herewith claims.

  
Attorney for Plaintiff

Defendant's address is:  
4972 Springhill Drive  
Pensacola, Florida

FILED

Apr 27 1967

ALICE J. JACK, CLERK  
RECEIVED

Returned  
4-27-67  
not found

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


AT LAW  
720-7493

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared  
J. A. Wurst, who first being duly and legally sworn desposes and  
says:

That A. F. Brown is justly indebted to the said Baldwin  
County Bank, a corporation, in the sum of Nineteen Thousand Dollars  
(\$19,000.00), together with interest since May 28, 1965, which said  
amount is justly due and that the said A. F. Brown resides out of  
the State of Alabama and that this attachment is not sued out for  
the purpose of vexing or harassing the said defendant. The said  
J. A. Wurst further states that this affidavit is executed by him  
as cashier of the Baldwin County Bank, a corporation, plaintiff in  
this suit.

Sworn to and subscribed before me  
on this the 27<sup>th</sup> day of April, 1967.

  
Notary Public, Baldwin County, Alabama.

FILED

APR 27 1967

ALICE L. DICK, CLERK

30 newspaper

BALDWIN COUNTY BANK, a corporation,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
A. F. BROWN,	)	AT LAW
	)	720.7493
Defendant.	)	

# NOTICE OF ATTACHMENT

Whereas, the plaintiff, Baldwin County Bank, a corporation, in the above styled cause, sued out in this court a writ of attachment against A. F. Brown; and whereas, said writ of attachment was executed by the Sheriff of Baldwin County, Alabama, on the 21 day of April, 1967, by levying upon the following described real property of the defendant situated in Baldwin County, Alabama, to-wit:

West Half of Southwest Quarter of Southeast Quarter of Section 19, Township 1 North, Range 4 East.

East Half of Southwest Quarter;  
Southeast Quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter,  
less 10 yards on the East side thereof,  
Section 15, Township 1 North, Range 4 East.

Northeast Quarter of Northeast Quarter,  
Section 34, Township 1 North, Range 4 East.

North Half of Southeast Quarter,  
Section 22, Township 1 North, Range 3 East.

All oil, gas and mineral rights situated on,  
in or under the Southeast Quarter of the  
Southeast Quarter and 30 acres of the North-  
east Quarter of the Southeast Quarter,  
Section 10, Township 1 North, Range 4 East.

Southwest Quarter of Northwest Quarter,  
Section 28, Township 1 North, Range 4 East.

South Half of Southeast Quarter,  
Section 3, Township 1 North, Range 4 East.

Southwest Quarter of Northwest Quarter,  
Section 3, Township 1 South, Range 4 East.

Northeast quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

and, whereas, the said defendant is a nonresident of the State of Alabama and that the place of residence and post office address of said defendant is 4972 Springhill Drive, Pensacola, Florida:

NOW, therefore, the defendant, A. F. Brown, is hereby notified of the issuance of said attachment and the execution thereof, and to be and appear, if he thinks proper, to defend said suit at the present term of said court and within thirty days after this notice by publication is completed.

WITNESS my hand this 27 day of April, 1967.

*Alvin J. French*  
Clerk

A copy of the above notice was mailed to the defendant at his address as <sup>now</sup> shown herein on the 1 day of April, 1967.

*Alvin J. French*  
Clerk

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

721.7483

RETURN OF SHERIFF

I have executed the writ of attachment in this case this  
27th day of April, 1967, by levying upon the following described  
real property situated in Baldwin County, Alabama, as the property  
of A. F. Brown, the defendant in said cause, to-wit:

West Half of Southwest Quarter of Southeast  
Quarter of Section 19, Township 1 North,  
Range 4 East.

East Half of Southwest Quarter;  
Southeast Quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter,  
less 10 yards on the East side thereof,  
Section 15, Township 1 North, Range 4 East.

Northeast Quarter of Northeast Quarter,  
Section 34, Township 1 North, Range 4 East.

North Half of Southeast Quarter,  
Section 22, Township 1 North, Range 3 East.

All oil, gas and mineral rights situated on,  
in or under the Southeast Quarter of the  
Southeast Quarter and 30 acres of the North-  
east Quarter of the Southeast Quarter,  
Section 10, Township 1 North, Range 4 East

Southwest Quarter of Northwest Quarter,  
Section 28, Township 1 North, Range 4 East.

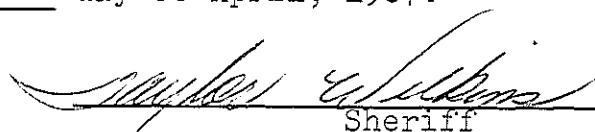
South Half of Southeast Quarter,  
Section 3, Township 1 North, Range 4 East.

Southwest Quarter of Northwest Quarter,  
Section 3, Township 1 South, Range 4 East.

Northeast Quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

and herewith return this writ to the court.

DATED this 27th day of April, 1967.

  
Sheriff

Recording fee 50¢

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

no. 7493

WRIT OF ATTACHMENT

STATE OF ALABAMA )

\*

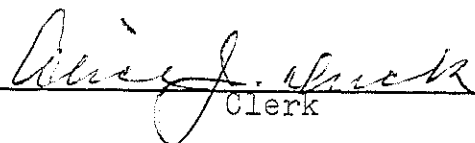
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

Whereas, Baldwin County Bank, a corporation, has complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that A. F. Brown is justly indebted to it in the sum of Nineteen Thousand Dollars (\$19,000.00), together with interest since May 28, 1965; that the said A. F. Brown, defendant, is a non-resident of the State of Alabama and the said plaintiff not being required to make bond in such cases; you are hereby commanded to attach so much of the estate of said A. F. Brown as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, Alabama, to be held at the courthouse thereof, when and where you must make known how you have executed this writ.

WITNESS my hand as Clerk of the said court on this the

27 day of April, 1967.

  
Clerk

# Notice of Levy on Real Estate

Baldwin County Bank, a corp. Plaintiff,

vs.

Baldwin County Circuit Court

A. F. Brown Defendant

To Harry Dolive Judge of Probate, Baldwin County, Alabama:

Notice is hereby given that under a Writ of Attachment

issued in favor of the Plaintiff in above entitled cause, I have levied on the following described property of said Defendants, described as follows, viz:

West Half of Southwest Quarter of Southeast Quarter of Section 19, Township 1 North, Range 4 East.

East Half of Southwest Quarter; Southeast Quarter of Northwest Quarter, Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter, less 10 yards on the East side thereof, Section 15, Township 1 North, Range 4 East.

Northeast Quarter of Northeast Quarter, Section 34, Township 1 North, Range 4 East.

North Half of Southeast Quarter, Section 22, Township 1 North, Range 3 East.

All oil, gas and mineral rights situated on, in or under the Southeast Quarter of the Southeast Quarter and 30 acres of the Northeast Quarter of the Southeast Quarter, Section 10, Township 1 North, Range 4 East.

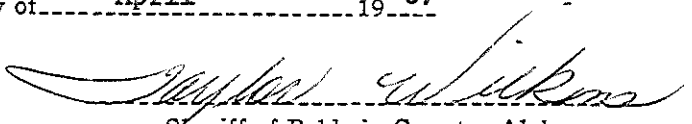
Southwest Quarter of Northwest Quarter, Section 28, Township 1 North, Range 4 East.

South Half of Southeast Quarter, Section 3, Township 1 North, Range 4 East. Southwest Quarter of Northwest Quarter, Section 3, Township 1 South, Range 4 East.

Northeast Quarter of Northwest Quarter, Section 10, Township 1 North, Range 4 East.

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 27th day of April 19 67

  
Sheriff of Baldwin County, Alabama



# The Baldwin Times

"Baldwin's Only All County Newspaper"

BAY MINETTE, ALABAMA

J. H. FAULKNER, Publisher

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
BALDWIN COUNTY BANK,  
a corporation

Plaintiff,

VS.

A. F. BROWN,

Defendant.

## NOTICE OF ATTACHMENT

Whereas, the plaintiff, Baldwin County Bank, a corporation, in the above styled cause, sued out in this court a writ of attachment against A. F. Brown; and whereas, said writ of attachment was executed by the Sheriff of Baldwin County, Alabama on the 27th day of April, 1967, by levying upon the following described real property of the defendant situated in Baldwin County, Alabama, to-wit: West Half of Southwest Quarter of Southeast Quarter of Section 19, Township 1 North, Range 4 East.

East Half of Southwest Quarter; Southeast Quarter of Northwest Quarter, Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter, less 10 yards on the East side thereof, Section 15, Township 1 North, Range 4  
Address of said defendant is 4972 Springhill Drive, Pensacola, Florida:

NOW, therefore, the defendant, A. F. Brown, is hereby notified of the issuance of said attachment and the execution thereof, and to be and appear, if he thinks proper, to defend said suit at the present term of said court and within thirty days after this notice by publication is completed.

WITNESS my hand this 27th day of April, 1967.

ALICE J. DUCK  
Clerk

A copy of the above notice was mailed to the defendant at his address as shown herein on the 1st day of May, 1967.

ALICE J. DUCK  
Clerk

18-4c

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

J. H. Faulkner, Jr., being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice of Attachment

Baldwin County Bank vs

A. F. Brown

## COST STATEMENT

383 WORDS @ .09 cents — — \$3.47  
I hereby certify this is correct, due and unpaid (paid).

J. H. Faulkner, Jr.  
Editor.

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication May 4, 1967 Vol 78 No. 18

Date of 2nd publication May 11, 1967 Vol 78 No. 19

Date of 3rd publication May 18, 1967 Vol 78 No. 20

Date of 4th publication May 25, 1967 Vol 78 No. 21

Subscribed and sworn before the undersigned this 25<sup>th</sup> day of May, 1967.

Dorothy Martin  
Notary Public, Baldwin County.

J. H. Faulkner, Jr.  
Editor.

FILED

MAY 29 1967

ALICE J. DUCK, CLERK  
REGISTRY

# Notice of Levy on Real Estate

Baldwin County Bank, a corp. Plaintiff,

vs.

A. F. Brown Defendant

Baldwin County Circuit Court

To Harry Dolive Judge of Probate, Baldwin County, Alabama:

Notice is hereby given that under a Writ of Attachment

issued in favor of the Plaintiff in above entitled cause, I have levied on the following described property of said Defendants, described as follows, viz:

West Half of Southwest Quarter of Southeast Quarter of Section 19, Township 1 North, Range 4 East.

East Half of Southwest Quarter; Southeast Quarter of Northwest Quarter, Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter, less 10 yards on the East side thereof, Section 15, Township 1 North, Range 4 East.

Northeast Quarter of Northeast Quarter, Section 34, Township 1 North, Range 4 East.

North Half of Southeast Quarter, Section 22, Township 1 North, Range 3 East.

All oil, gas and mineral rights situated on, in or under the Southeast Quarter of the Southeast Quarter and 30 acres of the Northeast Quarter of the Southeast Quarter, Section 10, Township 1 North, Range 4 East.

Southwest Quarter of Northwest Quarter, Section 28, Township 1 North, Range 4 East.

South Half of Southeast Quarter, Section 3, Township 1 North, Range 4 East. Southwest Quarter of Northwest Quarter, Section 3, Township 1 South, Range 4 East.

Northeast Quarter of Northwest Quarter, Section 10, Township 1 North, Range 4 East.

STATE OF ALABAMA,  
BALDWIN COUNTY.

I certify that this instrument was filed on

APR 27 1967 4:15 PM

and that no tax was collected. Recorded in

Book 6  
Page 221 Harry Dolive  
Judge of Probate

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 27th day of April 19 67

Sheriff of Baldwin County, Alabama

BOOK  
6  
PAGE 221

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW  
220.7493

RETURN OF SHERIFF

I have executed the writ of attachment in this case this  
1<sup>st</sup> day of April, 1967, by levying upon the following described  
real property situated in Baldwin County, Alabama, as the property  
of A. F. Brown, the defendant in said cause, to-wit:

West Half of Southwest Quarter of Southeast  
Quarter of Section 19, Township 1 North,  
Range 4 East.

East Half of Southwest Quarter;  
Southeast Quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

Northeast Quarter of Northwest Quarter,  
less 10 yards on the East side thereof,  
Section 15, Township 1 North, Range 4 East.

Northeast Quarter of Northeast Quarter,  
Section 34, Township 1 North, Range 4 East.

North Half of Southeast Quarter,  
Section 22, Township 1 North, Range 3 East.

All oil, gas and mineral rights situated on,  
in or under the Southeast Quarter of the  
Southeast Quarter and 30 acres of the North-  
east Quarter of the Southeast Quarter,  
Section 10, Township 1 North, Range 4 East

Southwest Quarter of Northwest Quarter,  
Section 28, Township 1 North, Range 4 East.

South Half of Southeast Quarter,  
Section 3, Township 1 North, Range 4 East.

Southwest Quarter of Northwest Quarter,  
Section 3, Township 1 South, Range 4 East.

Northeast Quarter of Northwest Quarter,  
Section 10, Township 1 North, Range 4 East.

and herewith return this writ to the court.

DATED this 1<sup>st</sup> day of April, 1967.

S/Taylor W. H. H. H. H. H.  
Sheriff

BALDWIN COUNTY BANK,  
a corporation,

Plaintiff,

VS.

A. F. BROWN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

720 7493

WRIT OF ATTACHMENT

STATE OF ALABAMA )

\*

BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

Whereas, Baldwin County Bank, a corporation, has complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that A. F. Brown is justly indebted to it in the sum of Nineteen Thousand Dollars (\$19,000.00), together with interest since May 28, 1965; that the said A. F. Brown, defendant, is a non-resident of the State of Alabama and the said plaintiff not being required to make bond in such cases; you are hereby commanded to attach so much of the estate of said A. F. Brown as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, Alabama, to be held at the courthouse thereof, when and where you must make known how you have executed this writ.

WITNESS my hand as Clerk of the said court on this the

27 day of April, 1967.

*Alice J. Duck*  
Clerk

BALDWIN COUNTY BANK,  
a corporation,  
  
Plaintiff,  
  
VS.  
  
A. F. BROWN,  
  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
AT LAW

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared  
J. A. Wurst, who first being duly and legally sworn desposes and  
says:

That A. F. Brown is justly indebted to the said Baldwin  
County Bank, a corporation, in the sum of Nineteen Thousand Dollars  
(\$19,000.00), together with interest since May 28, 1965, which said  
amount is justly due and that the said A. F. Brown resides out of  
the State of Alabama and that this attachment is not sued out for  
the purpose of vexing or harassing the said defendant. The said  
J. A. Wurst further states that this affidavit is executed by him  
as cashier of the Baldwin County Bank, a corporation, plaintiff in  
this suit.

Sworn to and subscribed before me  
on this the 27 day of April, 1967.

  
Notary Public, Baldwin County, Alabama.

FILED  
APR 27 1967  
ALICE J. DUCK, CLERK  
REGISTER

NOW, therefore, the defendant, A. F. Brown, is hereby notified of the issuance of said attachment and the execution thereof, and to be and appear, if he thinks proper, to defend said suit at the present term of said court and within thirty days after this notice by publication is completed.

WITNESS my hand this 17 day of April, 1967.

Alice J. French  
Clerk

A copy of the above notice was mailed to the defendant at his address as <sup>may</sup> shown herein on the 1 day of ~~April~~, 1967.

Alice J. French  
Clerk