

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eduardo Johnson 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 South Baldwin Bank, a corporation.

WITNESS my hand this 14 day of February, 1968.

(Alice D. Duck)
Clerk

The defendant resides at Spanish Fort, Alabama.

* * * * *

SOUTH BALDWIN BANK,
a corporation,

Plaintiff,

VS.

EDUARDO JOHNSON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

1993

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant Three Thousand Dollars (\$3,000.00) due by promissory note made by him on the 22nd day of July, 1967, and payable on the 22nd day of October, 1967, with interest thereon. Plaintiff avers that in and by the terms of the said note the defendant agreed to pay all costs of collection or securing or attempting to collect or secure the said note, including a reasonable attorney's fee, which attorney's fee plaintiff avers to be \$450.00 and which it herewith claims.

(Signature)
Attorney for Plaintiff

FEB 14 1968

MADE J. DUCK CLERK
REGISTER

1972

d. 14 day of Feb. 1968
23 day of Feb. 1968

A copy of the will of
Eduardo Johnson
Vice on above (Daphne)

TAYLOR WILKINS, Sheriff
By R. Randall D.C.

Sherriff's Office 54
Pay Costs for mile Retal \$ 5.40
TAYLOR WILKINS, Sheriff
By R. Randall
DEPUTY SHERIFF

South Baldwin
Bank, a corp.
Pltz.

vs.

Eduardo Johnson,
Def.

FILED

FEB 14 1968

ALICE J. BUCK CLERK
REGISTER

James R. Owen

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to serve the foregoing notice upon Eduardo Johnson, defendant, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

WITNESS my hand this 19 day of March, 1970.

Alice D. Duck
Clerk

Defendant resides at Spanish Fort.

Sheriff claims 154
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff

Received 19 day of March 1970
and on 20 day of March 1970
I served a copy of the within DEC
on Eduardo Johnson

By service on Eduardo Johnson
TAYLOR WILKINS, Sheriff
By [Signature] D. 541

047405

South Baldwin
Bank, a corp.

vs.

Eduardo Johnson

FILED

MAR 19 1970

ALICE J. DUCK CLERK
REGISTER

J. R. Owen

SOUTH BALDWIN BANK,
a corporation,

Plaintiff,

VS.

EDUARDO JOHNSON,

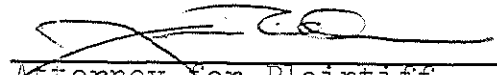
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
NO. 799B

REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered at the June term 1969, a judgment against the defendant in the above styled cause for the sum of \$3,790.00 and costs in the amount of \$33.40 and execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "No Property Found", the plaintiff now requests in writing that the Clerk of this court issue a notice to the above named defendant requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing under oath, of all of his assets of every kind, character, and description and wheresoever located as provided by Title 7, Section 903 of Code of Alabama.


Attorney for Plaintiff

FILED

MAR 19 1970

ALICE J. DUCK CLERK
REGISTER

SOUTH BALDWIN BANK,
a corporation,

PLAINTIFF,

VS.

EDUARDO JOHNSON,

DEFENDANT.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

: AT LAW

:

:

CASE NO: 7769

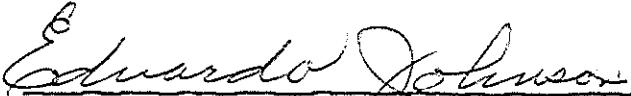
:

A N S W E R

Comes now Eduardo Johnson and makes this his sworn answer
to the plaintiff's writ of discovery in the above style cause:

I own no property, real, personal or mixed or any interest
therein. I have no assets, choses in action, money or accounts
with which to satisfy any claim against me.

IN WITNESS WHEREOF, I have hereunto this 25 day of
April, 1970, placed my hand and seal.

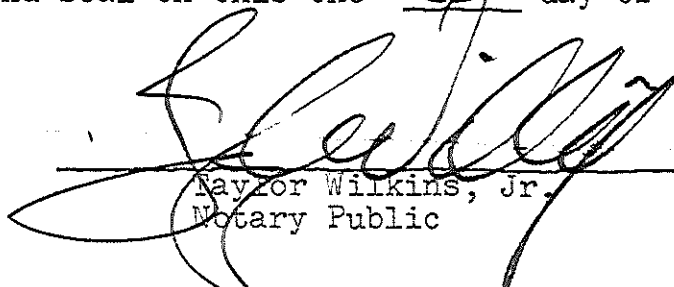

Eduardo Johnson
Defendant

STATE OF ALABAMA

BALDWIN COUNTY

I, Taylor Wilkins, Jr., a Notary Public in and for said
County in said State, hereby certify that Eduardo Johnson whose
name is signed to the foregoing instrument and who is known to
me, acknowledged before me on this the 25 day of April, 1970,
that, being informed of the contents of said instrument, he vol-
untarily executed the same on the day the same bears date.

Given under my hand and seal on this the 25 day of
April, 1970.


Taylor Wilkins, Jr.
Notary Public

FILED

MAY 17 1970

ALICE J. BUCK CLERK
REGISTER

SOUTH BALDWIN BANK,
a corporation,

Plaintiff,

vs.

EDUARDO JOHNSON,

Defendant.

X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7993

Comes now the Defendant, by his attorneys, and for
answer to the Complaint heretofore filed against him, says as
follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

By: 
Attorneys for Defendant

The Defendant demands a trial of this
cause by a jury.

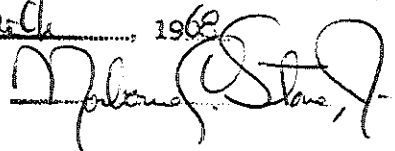
CHASON, STONE & CHASON

By: 
Attorneys for Defendant.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 14 day

of March, 1968



FILED

MAR 14 1968

ALICE J. DUCK

CLERK
REGISTER