

*Original*

RITE TILE OF MOBILE, INC.,  
a corporation doing business  
as STYLON OF MOBILE

Plaintiff

VS

JESSIE WADE

Defendant

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW

CASE NO.

8550

Plaintiff claims of the Defendant the sum of \$2,359.31 due from him by account on September 5, 1968, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

William L. Howell  
ATTORNEY FOR PLAINTIFF

Defendant may be served:

410 S. Section St., Fairhope, Alabama

**FILED**

JAN 28 1969

**ALICE J. DUCK** CLERK  
REGISTER

RITE TILE OF MOBILE, INC.,  
a corporation doing business  
as STYLON OF MOBILE

Plaintiff

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW  
)

VS  
JESSIE WADE

Defendant

CASE NO. 8537

Plaintiff claims of the Defendant the sum of \$2,359.31 due from him by account on September 5, 1968, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

William L Howell  
ATTORNEY FOR PLAINTIFF

Defendant may be served:

410 S. Section St., Fairhope, Alabama

FILED

JAN 28 1969

ALICE J. DUCK CLERK  
REGISTER

# STATEMENT OF ACCOUNT

Creditor Stylon of Mobile, 631 Houston St Mobile, Ala.

Debtor Jessie Wade Address 410 S Section St Fairhope, Ala.

Employment Wade Tile Co. Address 410 S. Section St Fairhope, Ala.

Professional Services Rendered On Account \$                     

Merchandise, Goods, Sold and Delivered On Account \$ 2,359.31

Date of Last Charge September 5, 1968

Date of Last Payment December 26, 1967

## SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X John J. Butler, Pres  
Affiant

Sworn and subscribed to before me this

24 day of Jan 19 69

John J. Butler  
Notary Public

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8551

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jessie Wade

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.....

Jessie Wade....., Defendant.....

by Rite Tile of Mobile, Inc., a Corp., d/b/a Stylon of Mobile

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

Witness my hand this 28 28th day of January 19 69.

Alice J. Duck Clerk

*Original*

No. 8550

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

RITE TILE OF MOBILE, INC., A Corp.,

d/b/a STYLON OF MOBILE  
Plaintiffs

vs.

JESSIE WADE

Defendants

SUMMONS AND COMPLAINT

Filed January 28, 1969

Alice J. Duck Clerk

William L. Howell

P. O. Box 293 Plaintiff's Attorney  
Mobile, Ala.

Defendant's Attorney

Defendant lives at

Received in Office  
**RECEIVED**

JAN 30 1969 19

~~WILLIAM~~ Sheriff

I have executed this summons

this 19

by leaving a copy with

*Jessie Wade*  
*Subj of Movel to*  
*Miss, address unknown*  
*2-469 Randall*

Sheriff

Deputy Sheriff

*410 So. Section*

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8551

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jessie Wade

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.....

Jessie Wade....., Defendant.....

by Rite Tile of Mobile, Inc., a Corp., d/b/a Stylon of Mobile.....

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

Witness my hand this 22.29th day of January 19 69.

Alice J. Luck Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office  
**RECEIVED**

JAN 30 1969 ..... 19.....

~~WILLIAM H. HARRIS~~ Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

# STATEMENT OF ACCOUNT

Creditor Stylon of Mobile . 631 Houston St Mobile, Ala.

Debtor Jessie Wade Address 410 S Section St Fairhope, Ala.

Employment Wade Tile Co. Address 410 S. Section St Fairhope, Ala.

Professional Services Rendered On Account \$                     

Merchandise, Goods, Sold and Delivered On Account \$ 2,359.31

Date of Last Charge September 5, 1968

Date of Last Payment December 26, 1967

## SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X John J. Ballou, Pres  
Affiant

Sworn and subscribed to before me this

24 day of Jan 19 69

Joe W. Hearn  
Notary Public



## OATH AND BOND, FOR ATTACHMENT

THE STATE OF ALABAMA.

BALDWIN COUNTY

Mobile XXXXXX

A NOTARY PUBLIC, STATE OF ALABAMA AT LARGE

Personally came before me, ~~GXXVXXVXAMSXXClerkXofXtheXCourtXofXGeneralXSessionsXof~~  
County, William L. Howell who being duly sworn, deposeth and  
saith that Jesse M. Wade

is justly indebted to

Rite Tile of Mobile, Inc., a corporation dba Stylon of Mobile

in the sum of ~~Two Thousand three hundred fifty nine and 31/100~~ Dollars

and further saith that the above mentioned Plaintiff elects not

~~to post bond as this attachment is filed against a non resident~~

~~Defendant under the provisions of Title 7 Section 849 Code of Alabama~~

1940 Recompiled 1958.

and that this Attachment is not sued out for the purpose of vexing or harassing the said defendant, or other improper motive.

~~Sworn to and subscribed before me this~~

...day of

1962

NOTARY PUBLIC - STATE OF ALABAMA AT LARGE

~~Check of the Court of General Sessions~~

of Mobile County

William L. Howell

THE STATE OF ALABAMA.

Know All Men by These Presents:

Mobile County

That we.

are held firmly bound unto

in the sum of \_\_\_\_\_ Dollars

to be paid to the said \_\_\_\_\_, his heirs, executors, administrators or assigns, for payment of which well and truly to be made, we bind ourselves, and each of us, our, and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals and dated this..... day of....., 19.....

The condition of the above obligation is such, that whereas, the above bound

\_\_\_\_\_ has on the day and date hereof prayed an attachment,

at the suit of \_\_\_\_\_ against the estate of the

above named

for the sum of \_\_\_\_\_ Dollars

and has obtained the same, returnable to the Court of General Sessions of Mobile County, in the city

of Mobile, on the.....day of....., 19.....

Now, if the said Plaintiff shall prosecute said attachment to effect and pay the defendant all such damages as he may sustain from the wrongful and vexatious suing out of such settlement, then this obligation is void, otherwise to remain in full force and effect.

Approved the \_\_\_\_\_ day of \_\_\_\_\_

19

Clerk of The Court of General Sessions  
of Mobile County

-(L.S.)

(L.S.)

(L.S.)

Notice of Levy on Real Estate

Rite Tile of Mobile, Inc., A Plaintiff,  
Corp. d/b/a Stylon of Mobile

vs.

Baldwin County Circuit Court

Jesse Wade 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:

Beg at NE Cor frac Sec. 19-6-2, run S 970 ft. W 25 ft. to a pt.

on W line of Section St, for beg pt, th W 180 ft, S 100 ft,

E 180 ft to pt. on W line of Section St, th N on W line Section

St. 100 ft. to beg. in frac NE 1/4 S. 19-6-2 less S. 70 ft. sold

to Mary Carney- 6 rm. brick hse.

From NE cor Sec. 19-6-2, run S 11.97 chs, W 25 ft, S 150 ft for

beg on W bndry Sec. St. the W 180 ft, S 200 ft, E 180 ft, N

along W. bndry Section St. 200 ft to beg.

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 26th day of February 1969

Sheriff of Baldwin County, Alabama

GIBBONS & STOKES

ATTORNEYS AT LAW

160 CONGRESS STREET

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

Februar 19, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Rite Tile of Mobile, Inc., a corporation dba  
Stylon of Mobile vs Jessie Wade

Dear Mrs. Duck:

Service of process for the above mentioned case recently filed in your Court was returned "Defendant not found". The change of address form forwarded to our office shows the defendant's new residence to be 1101 12th Street, Pascagoula, Mississippi, 39567.

We are informed that the Defendant, Jessie Wade, owns land in Baldwin County more particularly described as follows:

Beg at Ne cor frac sec 19-6-2, run S 970 ft  
W 25 ft to a pt on W line of Section St, for  
beg pt, th W 180 ft, S 100 ft, E 180 ft to pt  
on W line of Section St, th N on W line Section  
St 100 ft to beg. in frac NE $\frac{1}{4}$  S:19-6-2 less S.  
70 ft. sold to Mary Carney - 6 rm brick hse.

From NE cor Sec 19-6-2, run S 11.97 chs, W 25  
ft, S 150 ft for beg on W bndry Sec.St. the W  
180 ft, S 200 ft, E 180 ft, N along W.bndry  
Section St 200 ft to beg.

It is our desire and intention to obtain service upon this non resident defendant by attachment of the aforementioned Baldwin County real property under the provisions of Title

THE STATE OF ALABAMA,  
Baldwin County.

THE STATE OF ALABAMA,  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Rite Tile of Mobile, Inc., a Corporation, d/b/a Stykon  
of Mobile, by William L. Howell

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that

Jessie Wade

is justly indebted to the Plaintiff Rite Tile of Mobile, Inc., a Corporation, d/b/a  
Stylon of Mobile.

in the sum of Two Thousand Three hundred fifty-nine and 31/100 - - - Dollars, and

\_\_\_\_\_ having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
Jessie Wade

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said County, on \_\_\_\_\_ Monday of \_\_\_\_\_ 19 \_\_\_\_\_ next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 21st day of February A. D., 1969.

Alfred J. Duck Clerk.

THE STATE OF ALABAMA,  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Rite Tile of Mobile, Inc., a Corporation, d/b/a Styton  
of Mobile, by William L. Howell

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
Jessie Wade

is justly indebted to the Plaintiff Rite Tile of Mobile, Inc., a Corporation, d/b/a  
Stylon of Mobile,

in the sum of Two Thousand Three hundred fifty-nine and 31/100 - - - Dollars, and  
\_\_\_\_\_ having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
Jessie Wade

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be  
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said  
County, on \_\_\_\_\_ Monday of \_\_\_\_\_ 19 \_\_\_\_  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 21st day of February A. D., 1969.

Alice J. Duck Clerk.

RECEIVED

FEB 21 1969

~~NOTICE~~

CLERK OF DISTRICT COURT

NOTICE

No. 8550

## ATTACHMENT

RITE TILE OF MOBILE, INC., A CORP.,  
d/b/a STYLON OF MOBILE,

Vs. { ATTACHMENT

JESSE WADE

Issued February 21, 1969

Moore Printing Co.

Executed 2/26/69  
by attaching the  
within described  
property by filing  
Notice of Levy  
in Probate Office  
and posting copy  
of notice at Courthouse  
door. Jesse Wade  
being a non-resident,  
a return of "Not  
found" is made to  
the court.

Jaylor & Wilson  
& Warr

Gibbons & Stokes, Attorneys

# Notice of Levy on Real Estate

Rite Tile of Mobile, Inc., A Corp Plaintiff,  
d/b/a Stylon of Mobile

vs.

Baldwin County Circuit Court

Jesse Wade 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:-----

Beg at NE Cor frac Sec. 19-6-2, run S 970 ft. W 25 ft. to a pt.

on W line of Section St, for beg pt, th W 180 ft, S 100 ft,

E 180 ft to pt. on W line of Section St, th N on W line Section

St. 100 ft. to beg. in frac NE 1/4 S. 19-6-2 less S. 70 ft. sold

to Mary Carney- 6 rm. brick hse.

STATE OF ALABAMA,  
BALDWIN COUNTY

I certify that this instrument was filed on

FEB 24 1969 *10 AM*

and that no tax was collected. Recorded in *liberal*

Book 6  
Page 505 Judge of Probate

By *[Signature]*

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 24th day of February 19 69

*Pauler Wilkins*  
Sheriff of Baldwin County, Alabama

# Notice of Levy on Real Estate

Rite Tile of Mobile, Inc., A Plaintiff,  
Corp. d/b/a Stylon of Mobile

vs.

Baldwin County Circuit Court

Jesse Wade 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:

Beg at NE Cor frac Sec. 19-6-2, run S 970 ft. W 25 ft. to a pt.

on W line of Section St, for beg pt, th W 180 ft, S 100 ft,

E 180 ft to pt. on W line of Section St, th N on W line Section

St. 100 ft. to beg. in frac NE 1/4 S. 19-6-2 less S. 70 ft. sold

to Mary Carney- 6 rm. brick hse.

From NE cor Sec. 19-6-2, run S 11.97 chs, W 25 ft, S 150 ft for

beg on W bndry Sec. St. the W 180 ft, S 200 ft, E 180 ft, N

along W. bndry Section St. 200 ft to beg.

STATE OF ALABAMA  
BALDWIN COUNTY

I certify that this instrument was filed on

FEB 26 1969

and that no tax was collected. Recorded in

Book

Page

By

Judge of Probate

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 26th day of February 19 69

*Raymond Wilkins*  
Sheriff of Baldwin County, Alabama



ATTACHMENT NOTICE

The State of Alabama, {  
Baldwin County

No. 8550

CIRCUIT COURT

Term, 19

RITE TILE OF MOBILE, INC., A CORP., d/b/a

STYLON OF MOBILE

PLAINTIFFS

vs.

JESSE WADE

DEFENDANTS

ATTACHMENT

WHEREAS Rite Tile of Mobile, Inc., a Corp., d/b/a Styron of Mobile  
as Plaintiff in said cause, has obtained an Attachment out of this Court, issued the 21st  
day of February 19 69, against the estate of the said defendant Jesse Wade

which Attachment has been levied upon the following described Property

as the property of the said defendant, to-wit:  
Beg at NE Cor frac Sec. 19-6-2, run S 970 ft. W 25 ft. to a pt.  
on W line of Section St. for beg. pt. th W 180 ft, S 100 ft,  
E 180 ft to pt. on W line of Section St, th N on W line Section  
St. 100 ft. to beg. in frac NE 1/4 S. 19-6-2 less S. 70 ft. sold  
to Mary Carney - 6 rm. brick hse.  
From NE cor Sec. 19-6-2, run S 11.97 chs. W 25 ft, S 150 ft for  
beg on W bndry Sec. St. the W 180 ft, S 200 ft, E 180 ft, N  
along W. bndry Section St. 200 ft to beg.

and whereas, it appears that the said Jesse Wade

Defendant as aforesaid is a non-resident of the State of Alabama

NOW, THEREFORE, the said Jesse Wade

wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 25th day of March, 19 69

David J. Smith, Clerk

No \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA,**  
**BALDWIN COUNTY.**

**CIRCUIT COURT**

Plaintiffs

vs.

Defendants

**NOTICE TO NON-RESIDENTS  
OF ATTACHMENT**

Issued \_\_\_\_\_, 19\_\_\_\_

Clerk,

# The Baldwin Times

"Baldwin's Only All County Newspaper"

BAY MINETTE, ALABAMA

J. H. FAULKNER, Publisher

**ATTACHMENT NOTICE**  
THE STATE OF ALABAMA  
BALDWIN COUNTY  
NO. 8550  
CIRCUIT COURT  
RITE TITLE OF MOBILE, INC.,  
A CORP.,  
d/b/a STYLON OF MOBILE  
Plaintiffs

VS.  
JESSE WADE  
Defendants

**ATTACHMENT**  
WHEREAS Rite Title of Mobile, Inc., a Corp., d/b/a Stylon of Mobile as Plaintiff in said cause, has obtained an Attachment out of this Court, issued the 21st day of February 1969, against the estate of the said defendant Jesse Wade which Attachment has been levied upon the following described property as the property of the said defendant, to-wit:

Beginning at northeast corner fractional Section 19-6-2, run South 970 feet West 25 feet to a point on West line of Section Street for beginning point, thence West 180 feet, South 100 feet, East 180 feet to point on West line of Section Street, thence North on West line Section Street 100 feet to beginning in fractional northeast 1/4 South 19-6-2 less South 70 feet sold to Mary Carney - 6 room brick house. From Northeast corner Section 19-6-2, run South 11.97 chains, West 25 feet, South 150 feet for beginning on West boundary Section Street, thence West 180 feet, South 200 feet, East 180 feet, North along West boundary Section Street 200 feet to beginning.

and whereas, it appears that the said Jesse Wade, Defendant, as aforesaid is a non-resident of the State of Alabama.

NOW, THEREFORE, the said Jesse Wade wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 25th day of March, 1969.

ALICE J. DUCK,  
Clerk

13-4c

## 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

Rite Title of Mobile, Inc. d/b/a  
Stylon of Mobile vs. Jesse Wade

### COST STATEMENT

272 WORDS @ 07 cents — \$ 19.04  
I hereby certify this is correct, due and unpaid (paid).

J. H. Faulkner, Jr.  
Editor.

was published in said newspaper for 3 consecutive weeks in the following issues:

Date of 1st publication March 27, 1969 Vol. 80 No. 13

Date of 2nd publication April 3, 1969 Vol. 80 No. 14

Date of 3rd publication April 10, 1969 Vol. 80 No. 15

Date of 4th publication \_\_\_\_\_, 19\_\_\_\_ Vol. \_\_\_\_\_ No. \_\_\_\_\_

Subscribed and sworn before the undersigned this 18 day of Apr, 1969.

Dorothy M. Smith  
Notary Public, Baldwin County.

J. H. Faulkner, Jr.  
Editor.

**FILED**

APR 22 1969

**ALICE J. DUCK**

CLERK  
REGISTER

-71

OATH AND BOND, FOR ATTACHMENT

THE STATE OF ALABAMA,  
BALDWIN COUNTY  
~~Mobile County~~

A NOTARY PUBLIC, STATE OF ALABAMA AT LARGE

Personally came before me, ~~C. V. ADAMS, Clerk of the Court of General Sessions of Mobile~~  
County, William L. Howell who being duly sworn, deposeth and  
saith that Jesse M. Wade

is justly indebted to

Rite Tile of Mobile, Inc., a corporation dba Stylon of Mobile  
in the sum of Two Thousand three hundred fifty nine and 31/100 Dollars

and further saith that the above mentioned Plaintiff elects not  
to post bond as this attachment is filed against a non resident

Defendant under the provisions of Title 7 Section 849 Code of Alabama  
1940 Recompiled 1958

and that this Attachment is not sued out for the purpose of vexing or harassing the said defendant, or  
other improper motive.

Sworn to and subscribed before me this

day of

19

NOTARY PUBLIC, STATE OF ALABAMA AT LARGE  
Clerk of the Court of General Sessions  
of Mobile County

William L. Howell  
William L. Howell

THE STATE OF ALABAMA,

Know All Men by These Presents:

Mobile County

That we,

are held firmly bound unto

in the sum of \_\_\_\_\_ Dollars

to be paid to the said \_\_\_\_\_, his heirs, executors,  
administrators or assigns, for payment of which well and truly to be made, we bind ourselves, and each  
of us, our, and each of our heirs, executors and administrators, jointly, severally and firmly by these  
presents.

Sealed with our seals and dated this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

The condition of the above obligation is such, that whereas, the above bound \_\_\_\_\_

has on the day and date hereof prayed an attachment,

at the suit of \_\_\_\_\_ against the estate of the

above named \_\_\_\_\_

for the sum of \_\_\_\_\_ Dollars

and has obtained the same, returnable to the Court of General Sessions of Mobile County, in the city  
of Mobile, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

Now, if the said Plaintiff shall prosecute said attachment to effect and pay the defendant all  
such damages as he may sustain from the wrongful and vexatious suing out of such settlement, then  
this obligation is void, otherwise to remain in full force and effect.

Approved the \_\_\_\_\_ day of \_\_\_\_\_

19\_\_\_\_\_

Clerk of The Court of General Sessions  
of Mobile County

(L. S.)

(L. S.)

(L. S.)

ATTACHMENT NOTICE

The State of Alabama,  
Baldwin County

No. 8550

CIRCUIT COURT

Term, 19

RITE TILE OF MOBILE, INC., A CORP., d/b/a

STYLON OF MOBILE

PLAINTIFFS

vs.

JESSE WADE

DEFENDANTS

ATTACHMENT

WHEREAS Rite Tile of Mobile, Inc., a Corp., d/b/a Strylon of Mobile  
as Plaintiff in said cause, has obtained an Attachment out of this Court, issued the 21st  
day of February 19 69, against the estate of the said defendant Jesse Wade

which Attachment has been levied upon the following described Property

as the property of the said defendant, to-wit:

Beg at NE Cor frac Sec. 19-6-2, run S 970 ft. W 25 ft. to a pt.  
on W line of Section St. for beg. pt. th W 180 ft, S 100 ft,  
E 180 ft to pt. on W line of Section St, th N on W line Section  
St. 100 ft. to beg. in frac NE 1/4 S. 19-6-2 less S. 70 ft. sold  
to Mary Carney - 6 rm. brick hse.

From NE cor Sec. 19-6-2, run S 11.97 chs. W 25 ft, S 150 ft for  
beg on W bndry Sec. St. the W 180 ft, S 200 ft, E 180 ft, N  
along W. bndry Section St. 200 ft to beg.

and whereas, it appears that the said Jesse Wade

Defendant as aforesaid is a non-resident of the State of Alabama

NOW, THEREFORE, the said Jesse Wade

wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 25th day of March, 19 69

Adrian J. Smith, Clerk

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III  
JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

Februar 19, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

8550

Re: Rite Tile of Mobile, Inc., a corporation dba  
Stylon of Mobile vs Jessie Wade

Dear Mrs. Duck:

Service of process for the above mentioned case recently filed in your Court was returned "Defendant not found". The change of address form forwarded to our office shows the defendant's new residence to be 1101 12th Street, Pascagoula, Mississippi, 39567.

We are informed that the Defendant, Jessie Wade, owns land in Baldwin County more particularly described as follows:

Beg at Ne cor frac sec 19-6-2, run S 970 ft  
W 25 ft to a pt on W line of Section St, for  
beg pt, th W 180 ft, S 100 ft, E 180 ft to pt  
on W line of Section St, th N on W line Section  
St 100 ft to beg. in frac NE $\frac{1}{4}$  S.19-6-2 less S.  
70 ft. sold to Mary Carney - 6 rm brick hse.

From NE cor Sec 19-6-2, run S 11.97 chs, W 25  
ft, S 150 ft for beg on W bndry Sec.St. the W  
180 ft, S 200 ft, E 180 ft, N along W.bndry  
Section St 200 ft to beg.

It is our desire and intention to obtain service upon this non resident defendant by attachment of the aforementioned Baldwin County real property under the provisions of Title

February 19, 1969  
Page Two

7 Section 849 Code of Alabama, 1940 Recompiled 1958.

At your earliest convenience, please notify the Sheriff of Baldwin County so that he may levy upon the above described property. Please notify us if and when the Baldwin County Circuit Court obtains jurisdiction over the Defendant by resort to this attachment procedure. Please proceed with publication of the foregoing as soon as possible.

Sincerely yours,

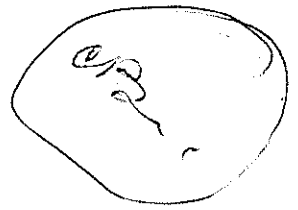
GIBBONS & STOKES

  
William L. Howell

WLH/al

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611



E. GRAHAM GIBBONS  
E. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

April 7, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Rite Tile of Mobile, Inc. a corporation d/b/a Stylon  
of Mobile vs. Jessie Wade

Dear Mrs. Duck:

Attached find a copy of an Attachment Notice.

It has come to my attention that the described property is not owned by Jessie Wade; therefore, at your earliest convenience, please have the Attachment set aside and send us a cost bill.

Thank you for your kind consideration in this matter.

Sincerely,

GIBBONS & STOKES, ATTORNEYS

  
by William L. Howell

WLH/dh

cc: Mr. John Duck  
Attorney at Law



AK 8550

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA

TELEPHONE 433-2611

January 27, 1969

E. GRAHAM GIBBONS  
B. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

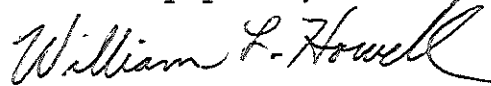
Mrs. Alice J. Duck, Clerk  
Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Rite Tile of Mobile, Inc., a corporation, d/b/a  
Stylon of Mobile vs Jessie Wade

Dear Mrs. Duck:

On this date, we filed complaint and summons in the  
above styled cause. Unless we hear from you to the  
contrary, we shall assume you have received and  
processed this complaint and summons.

Sincerely yours,



William L. Howell

WLH:fo

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

January 30, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court, Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

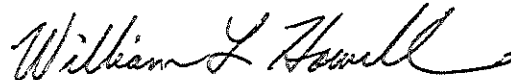
8550

Re: Rite Tile of Mobile, Inc., a corporation dba  
Stylon of Mobile vs Jessie Wade

Dear Mrs. Duck:

We request that service of process on Jessie Wade be made through the Secretary of State of Alabama. The new address of the Defendant is 1101 12th Street, Pascagoula, Mississippi. I would very much appreciate you notifying me if and when you receive notice of service.

Sincerely yours,



William L. Howell

WLH/al

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

April 1, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Rite Tile of Mobile, Inc., a corporation dba Stylon  
of Mobile vs Jessie Wade  
Case No. 8550

Dear Mrs. Duck:

You recently notified me that service incident to the above styled cause was returned "not found".

In my letter to you dated March 24, 1969 I requested that the Sheriff of Baldwin County levy upon real estate owned by Jessie Wade lying in Baldwin County and more particularly described as follows:

Beg at NE cor frac sec 19-6-2, run S 970 ft  
W 25 ft to a pt on W line of Section St, for  
beg pt, th W 180 ft, S 100 ft, E 180 ft to pt  
on W line of Section St, th N on W line Section  
St 100 ft to beg. in frac NE $\frac{1}{4}$  S.19-6-2 less S.  
70 ft. sold to Mary Carney - 6 rm brick hse.

From NE cor Sec 19-6-2, run S 11.97 chs, W 25  
ft, S 150 ft for beg on W bndry Sec.St. the W  
180 ft, S 200 Ft, E 180 ft, N along W bndry  
Section St 200 ft to beg.

Jessie Wade is a non resident of Alabama and it is the desire and intention of my client to attach thereal property set out above in order to obtain service upon Mr. Wade pursuant to Alabama Code of 1940 (recompiled 1958) Title 7 Sec. 852.

April 1, 1969  
Page Two

If the Sheriff of Baldwin County has levied upon the property, please give notice of that attachment by advertising once a week for three successive weeks in some newspaper, and forward a copy of same by mail to the defendant at 1101 12th Street, Pascagoula, Mississippi, 39567, or at any other address subsequently made known to you; when such publication is perfected please notify me.

I appreciate the kind consideration you have tendered me and request that the necessary levy by the Sheriff and publication of levy proceed at your earliest convenience.

Sincerely yours,

GIBBONS & STOKES

A handwritten signature in cursive script, appearing to read "William L. Howell".

William L. Howell

WLH/al

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III  
JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

January 27, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court  
Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

8557

Re: Rite Tile of Mobile, Inc. a corporation dba Stylon of  
Mobile vs Jessie Wade

Dear Mrs. Duck:

Enclosed is a copy of the complaint and summons in the  
above matter. Please file the same in your Court for  
service on the Defendant.

Sincerely yours,

*William L. Howell*

William L. Howell

WLH/al

Enclosure

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

JOHN S. GONAS, JR.  
WILLIAM L. HOWELL

March 24, 1969

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Rite Tile of Mobile, Inc., a corporation dba  
Stylon of Mobile vs Jessie Wade

Dear Mrs. Duck:

Kindly advise us whether or not service has been obtained upon the above mentioned non resident defendant by attachment of his real estate lying in Baldwin County.

If the Sheriff has levied upon Baldwin County real property belonging to Jessie Wade, please proceed with publication at your earliest convenience.

Sincerely yours,

GIBBONS & STOKES



William L. Howell

WLH/al