

4511
JAMES W. WELGOS,

Complainant

vs.

VERNON HEAD and
NANCY HEAD,

Respondents

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

WRIT OF INJUNCTION

TO VERNON HEAD AND NANCY HEAD, AND THEIR AGENTS, SERVANTS AND EMPLOYEES:

WHEREAS, James W. Welgos has exhibited his Bill of Complaint in Equity in the Circuit Court of Baldwin County, Alabama, and has obtained from the Honorable Hubert M. Hall, Judge, an order for the issuance of a temporary injunction or restraining order to restrain you, as hereinafter mentioned; and,

WHEREAS, the said Complainant has, in accordance with said order, entered bond conditioned as required by law in the sum of \$ _____, which has been approved by me:

NOW, THEREFORE, you and each of you and your agents, servants and employees are hereby enjoined from interfering with the business of Human Engineering, Incorporated; from interfering with the financial activities of Human Engineering, Incorporated at the Bank of Fairhope, Fairhope, Alabama; from interfering with the receipt of United States mail in the United States Post Office at Fairhope, Alabama; and from interfering with financial activities of Human Engineering, Incorporated at the Baldwin County Savings and Loan Association, Fairhope, Alabama.

Witness my hand and seal this 17 day of February, 1959.

Reice J. Alcorn
REGISTER

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA:

You are hereby commanded to execute this writ and return the same with your endorsement thereon to this Court with all convenient dispatch.

Witness my hand this the 17 day of February, 1959.

Reice J. Alcorn
REGISTER

Executed
2-20-59

2-17-53
Accepted
Nancy Head

Received 17 day of Feb 1953
and on 20 day of Feb 1953
served a copy of the within Writ of Exoneration
on Thomson Head
Nancy Head
by service on Thomson Head

TAYLOR WILKINS, Sheriff

By J. P. Horn D. S.
J. P. Horn

Sheriff claims 140.70 miles at
Ten Cents per mile Total \$14.07
TAYLOR WILKINS, Sheriff
BY N. W. Horn
DEPUTY SHERIFF

James W. Helgeson
vs.
Thomson Head &
Nancy Head
403 - Bank St. 9 hrs
2-17-53

THE STATE OF ALABAMA,
BALDWIN COUNTY

JAMES W. WELGOS

Complainant....

vs.

VERNON HEAD AND NANCY HEAD

Defendant....

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

KNOW ALL MEN BY THESE PRESENTS, That we James W. Welgos,

Peneta Scardamalia and Sybil S. Pickering

are held and firmly bound unto Vernon Head and Nancy Head Defendant....

in the sum of Five Hundred (\$500.00) DOLLARS,

to be paid to the said Vernon Head and Nancy Head Defendant....

their heirs or assigns, for the payment of which, well and truly to be made, we bind ourselves,

jointly and severally, and each of us, our heirs, executors and administrators, firmly by these presents.

Witness our hands and seals, this _____ day of February 19__

Whereas, the Complainant has requested an injunction or restrain-
ing order against the Respondents to enjoin them from inter-
fering with the operations of Human Engineering, Inc. and has
filed a Complaint in the Circuit Court of Baldwin County, Alabama.

NOW, THEREFORE, The condition of the above obligation is such, that if the above bounden

Vernon Head and Nancy Head

executors, administrators, or any of them, shall and do well and truly pay, or cause to be paid, all damages and costs which any person may sustain by the suing out of such injunction, if the same is dissolved.

then the above obligation to be void, otherwise to remain in full force.

And we, and each of us, hereby waive all our rights of claim of exemption we or either of us have now or may hereafter have under the Constitution and laws of the State of Alabama, and we hereby severally certify that we have property free from all encumbrance to the full amount of the above bond.

Witness our hands and seals, this 17th day of February 1959

Taken and approved,

Feb - 17, 1959

W. J. Alcock
Clerk.

James W. Wadley (L. S.)

Donatella C. Wadley (L. S.)

Lybil A. Pickering (L. S.)

____ (L. S.)

124

No. 4571

The State of Alabama
Baldwin County

CIRCUIT COURT OF

IN EQUITY

Complainant

vs.

Defendant

INJUNCTION BOND

Filed Feb 17, 1959

W. J. Alcock
Clerk.

Final Record Page

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The 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 Vernon Head and Nancy Head

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 _____

~~Vernon Head and Nancy Head~~ _____, Defendant _____

by James W. Welgos _____

_____, Plaintiff _____

Witness my hand this 17 day of July 1954

Executed
2-28-59

Alvin J. Hirsch _____, Clerk

No. 4511 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

JAMES W. WELGOS

Plaintiffs

vs.

VERNON HEAD AND NANCY HEAD

Defendants

Summons and Complaint

Filed 2-17-59 19____

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

2/17 1959

_____, Sheriff

I have executed this summons

this 20 Feb. 1959

by leaving a copy with

Vernon Head
Nancy Head

Shall claim 140.70 miles at 2.25 00
Ten Cents per mile Total \$
TAYLOR WILLIAMS Sheriff
BY [Signature] DEPUTY SHERIFF

[Signature] Sheriff

[Signature] Deputy Sheriff

[Signature]

STATE OF ALABAMA)

BALDWIN COUNTY)

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

James W. Welgos
Vernon Head
Nancy Head

Comes now JAMES W. WELGOS, as Complainant, and presents this Bill of Complaint against VERNON HEAD and NANCY HEAD and respectfully shows unto the Court and Your Honor as follows:

1. The Complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama.
2. The Respondents are over the age of twenty-one years and are residents of Baldwin County, Alabama.
3. The Complainant is the founder, duly appointed managing director and member of the Board of Trustees of Human Engineering, Incorporated.
4. That the said Vernon Head and Nancy Head claim to be the duly elected President and Chairman of the Board of Trustees of Human Engineering, Incorporated by reason of a meeting whereat they allege to have been elected to those offices. That following such alleged election, said parties exhibited documents to the Bank of Fairhope, Fairhope, Alabama, United States Government Post Office, Fairhope, Alabama and the Baldwin County Savings and Loan Association, Fairhope, Alabama and by virtue of such documents have caused the funds and mail of Human Engineering, Incorporated to be impounded. As a result of such action, there has been an interference with the business of Human Engineering, Incorporated. The interference, as aforesaid, will cause irreparable injury to the operation of Human Engineering, Incorporated.
5. The Complainant claims of the Respondents the sum of One Hundred Fifty (\$150.00) Dollars as damages suffered by the Complainant by reason of the action of Respondents as aforesaid.

PRAYER FOR PROCESS

Complainant prays that the usual process of this Honorable Court forthwith issue to the Respondents and each of them, commanding them to appear in this Court and plead, answer or demur to this

Bill of Complaint within the time prescribed by law.

PRAYER FOR RELIEF

Complainant prays for the following separate and several relief:

1. That a temporary writ of injunction or restraining order be issued to the Respondents and each of them enjoining or restraining them and each of them or their agents, servants and employees from interfering with the business of Human Engineering, Incorporated.
2. That upon a final decree, upon a final hearing of this cause, the temporary injunction or restraining order be made permanent.
3. That a decree be rendered in favor of the Complainant and against the Respondents for the damages sustained by the Complainant.
4. Complainant prays for such other, further and general relief as he may be equitably entitled to, the premises considered.


SOLICITOR FOR COMPLAINANT

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, the undersigned authority in and for said State and County, personally appeared James W. Welgos, who, after being by me first duly and legally sworn, deposes and says:

That he is the Complainant in the above entitled cause; that he has read over the foregoing Bill of Complaint and that the facts stated therein are true.

James W. Welgos
JAMES W. WELGOS

Sworn to and subscribed before me
this the 17th day of February, 1959.

Ernest M. Bailey
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA

§

FIAT

BALDWIN COUNTY

§

This cause being submitted to the Court upon application of the Complainant for a temporary writ of injunction, as prayed for in the original Bill of Complaint, the same filed in this cause, and upon consideration thereof the Court is of the opinion that the same should be granted;

It is, therefore, ORDERED, ADJUDGED AND DECREED by the Court that upon Complainant's entering into a good and sufficient bond, conditioned as provided by law, in the sum of \$ 500⁰⁰, to be approved by the Register of Baldwin County that the Register of said Court issue a temporary writ of injunction as prayed for in the said Bill of Complaint filed in this cause.

Ordered and Done this the 17th day of February, 1959.

Hubert M. Steel
JUDGE