

FARMERS & MERCHANTS BANK of
Foley, a corporation,

Complainant,

-vs-

W. F. HILCHER, Sr., GERTRUDE
HILCHER, THE HILCHER MERCANTILE
COMPANY, a Corporation, CHARLES
G. HILCHER, WALTER F. HILCHER
Jr., and LOUISE NETTLES,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your Complainant respectfully shows to the Court that it is a corporation organized and existing under the laws of the State of Alabama, engaged in a general banking business with its principal place of business at Foley, Alabama; that the respondent W. F. Hilcher is over the age of 21 years and a resident of Baldwin County, Alabama; that the respondent Gertrude Hilcher is over the age of 21 years and a resident of Baldwin County, Alabama; that the respondent, Hilcher Mercantile Company is a corporation organized and existing under the laws of the State of Alabama with its principal place of business in Foley, Alabama; that the respondent, Charles G. Hilcher is over the age of 21 years and a resident of Baldwin County, Alabama; that the respondent, Walter F. Hilcher Jr. is over the age of 21 years and a non-resident of the State of Alabama, his whereabouts and place of residence being unknown to your complainant; that the respondent Louise Nettles is over the age of 21 years and a resident of Bay Minette, in Baldwin County Alabama.

PART TWO

1. Your Complainant further avers that for many years prior to and ever since December 8th, 1931, the respondent W. F. Hilcher was indebted to your Complainant upon various promissory notes and that during the September, 1935, term of the Circuit Court of Baldwin

County, Alabama, a judgment was entered in favor of Complainant and against the respondent W. F. Hilcher in the sum of THIRTY ONE HUNDRED SEVENTY SIX & 78/100 (\$3176.78) DOLLARS and costs in the amount of SIXTEEN DOLLARS & 95/100 (\$16.95) and that said judgment remains wholly unpaid, although execution thereon has been issued to the sheriff of Baldwin County Alabama, the said execution having been returned "No property found."

2. That after said indebtedness to complainant had been incurred by said respondent W. F. Hilcher and while said indebtedness was a valid and subsisting debt of said respondent to your complainant, but before the entry of the judgment as aforesaid and on, to-wit: November 21st, 1932, the said respondents W. F. Hilcher, Gertrude Hilcher, who is the wife of the respondent W. F. Hilcher, and Louise Nettles confederating together for the purpose of hindering and delaying the complainant in the collection of its said debt and to prevent the complainant from collecting its said debt, did cause to be formed a corporation, being the respondent Hilcher Mercantile Company and it caused the Declaration of Incorporation of said Hilcher Mercantile Company to be filed for record in the office of the Judge of Probate of Baldwin County, Alabama, on December 15th, 1932. Said corporation was to have a capital stock of THREE THOUSAND & 00/100 (\$3,000.00) DOLLARS divided into thirty shares of ONE HUNDRED & 00/100 (\$100.00) DOLLARS each and in said Declaration of Incorporation it was stated that the stock of said corporation was to be paid for by the conveyance of real estate and personal property by W. F. Hilcher Sr. and Gertrude Hilcher, his wife, to the said Hilcher Mercantile Company by conveyance dated November 21st, 1932, which was to pay all subscription to capital stock of the said corporation in full and that the stock of said corporation would be issued 18.6 shares to the respondent, Gertrude Hilcher, who was made the President of said corporation, 10.4 shares to the respondent Louise Nettles, who was made the Vice-President of said corporation and one share to the respondent

W. F. Hilcher who was made the Secretary - Treasurer of said corporation. That neither the said Gertrude Hilcher or Louise Nettles owned any interest in the property conveyed to said corporation in payment for said shares but the same was wholly the property of the respondent W. F. Hilcher, and the issuance of said shares to said respondents was, in effect, a gift of said property by the said W. F. Hilcher and was a voluntary conveyance, without consideration, of the property of the respondent W. F. Hilcher hereinafter described.

3. That in furtherance of said scheme and confederation to delay and defraud the complainant in the collection of its debt, the said respondents W. F. Hilcher and Gertrude Hilcher did on said November 21st, 1932, make and execute a warranty deed to the said Hilcher Mercantile Company which deed was recorded on said December 15th, 1932, in Deed Book 52 N. S. at pages 580 - 581 thereof in the records in the office of the Judge of Probate of Baldwin County, Alabama, which said deed conveyed from said respondents W. F. Hilcher Sr. and Gertrude Hilcher, his wife, to said Hilcher Mercantile Company, the following described real estate in Baldwin County, Alabama, to-wit:

✓ The northwest Quarter (NW $\frac{1}{4}$) of the Northeast Quarter (NE $\frac{1}{4}$) of section twenty eight (28) township eight (8) south of range three (3) east..... ✓

An undivided $\frac{2}{5}$ interest together with an undivided $\frac{1}{10}$ interest in the south part of the fractional Northeast Quarter (NE $\frac{1}{4}$) and all of the fractional Southeast Quarter (SE $\frac{1}{4}$) of section twenty-five (25) and the fractional Northeast Quarter (NE $\frac{1}{4}$) of section thirty-six (36) all in township seven (7) south of Range two (2) east.....

The Southwest Quarter (SW $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$) of section thirty (30) in township seven (7) south of range three (3) east, excepting and reserving therefrom the following described lots: Lots 11, 12, 13, 28, 29, 41, 43, 45, 46, 47, 48, 49, 50, 51 in block one (1); also lots 51 in block 5, lot 3 in block 9 and lots 24, 25 and 26 in block 10, according to the plat and survey of the Magnolia Park Allotment, made of the above described lands, subject to a mortgage heretofore given to Charles G. Hilcher in the sum of TWENTY SEVEN & 00/100 (\$2700.00) DOLLARS bearing date of September 24th, 1930.....

Commencing at the intersection of section twenty (20), 21, 28 and 29 in Township Seven (7) South Range four (4) east; thence run due west 531 feet; thence north 20 feet for a beginning corner; thence north 333 feet; thence west 120 feet and 5 inches; thence south 333 feet; thence east 120 feet and 5 inches to the place of beginning, known as lot one (1) in acreage block six (6) in the Magnolia Springs Land Company's subdivision of the southeast Quarter (SE $\frac{1}{4}$) of section twenty (20) township seven (7) south of range four (4) east, a subdivision of the Town of Foley, Alabama.....

Lots 23 and 24 in block 9 in the Town of Foley, together with all improvements thereon, subject to a mortgage from Merchants National Bank of Mobile, Alabama, in approximately the sum of TWO THOUSAND & 00/100 (\$2,000.00) DOLLARS and also subject to a mortgage heretofore given to Walter F. Hilcher Jr. in the sum of FIFTY FIVE HUNDRED & 00/100 (\$5500.00) DOLLARS, bearing date of February 10th, 1931.....

4. That said conveyance of said real estate so made by the respondents W. F. Hilcher and Gertrude Hilcher to said respondent, Hilcher Mercantile Corporation was a voluntary conveyance and made without any consideration whatever except the issuance of the capital stock in said Hilcher Mercantile Company heretofore mentioned; that the issuance of 18.6 shares of said capital stock to Gertrude Hilcher and 10.4 shares to Louise Nettles was without consideration from either of said respondents, Gertrude Hilcher and Louise Nettles and had the effect of conveying to said respondents the property of the respondent W. F. Hilcher without consideration and for the sole and only purpose of hindering and delaying the complainant in the collection of its debt as aforesaid, and to prevent the Complainant from collecting its said debt and that said conveyance and the creation of said corporation were all a part of the scheme and conspiracy of the respondents W. F. Hilcher, Gertrude Hilcher Louise Nettles to hinder and delay the complainant in the collection of its debt and to prevent the complainant from collecting its said debt, and that the said transactions were wholly without consideration and were simulated for the purposes aforesaid.

5. That in addition to the real estate hereinbefore described and so conveyed, there was included in said warranty deed of November 21st, 1932, from W. F. Hilcher Sr. and Gertrude Hilcher to said Hilcher Mercantile Company the following described personal property:

11. Your Complainant further avers that there has never been any change in the possession, use or enjoyment of any of the real estate conveyed to the respondent, Charles G. Hilcher or to the respondent, Walter F. Hilcher Jr. by the several mortgages hereinbefore mentioned; that at all times since the dates on which said several mortgages are claimed to have been made by the respondents, as before, the said W. F. Hilcher Sr. has remained in possession and control of the ^{property conveyed thereby} $\frac{1}{2}$, enjoying the use and profits therefrom and said mortgage to the said Charles G. Hilcher and said mortgage to the said Walter F. Hilcher Jr. were and are merely colorable transactions, made without consideration, and merely for the purpose of hindering and delaying the complainant in the collection of its debt.

12. That the property hereinbefore mentioned and described, so conveyed by the respondent W. F. Hilcher Sr., was and is all the property owned by the said W. F. Hilcher Sr., both real and personal, except the homestead of the said respondent which homestead is exempt to the extent of \$2,000.00 in value and to the further extent of a mortgage thereon held by Home Owners Loan Corporation and that said homestead was conveyed by the said W. F. Hilcher to the respondent Gertrude Hilcher on the said November 21st, 1932. Said conveyance of said homestead was also voluntary and without consideration, but because of the homestead exemption and the mortgage to Home Owners Loan Corporation was without damage to this complainant but the said respondent W. F. Hilcher Sr. by the conveyances aforesaid has transferred away all of his property, real and personal and has no property remaining in his name and subject to the lien of the judgment of the complainant and therefore and thereby, complainant is wholly unable to collect any part of its debt and judgment and has been defrauded by the conveyances hereinbefore mentioned.

PRAYER FOR RELIEF

WHEREFORE your Complainant prays that your honor will take jurisdiction of its cause as made by this Bill of Complaint and upon a hearing thereof, will enter a decree holding fraudulent and void the said deed from W. F. Hilcher Sr. and Gertrude Hilcher to the Hilcher Mercantile Company dated November 21st, 1932, and filed for record in the office of the Judge of Probate, Baldwin County, Alabama, on December 15th, 1932, in Deed Book 52 N. S., page 580 - 581 thereof; the pretended mortgage for \$2700.00 from the respondents W. F. Hilcher Sr. and Gertrude Hilcher to the respondent Charles G. Hilcher dated September 24th, 1930; the pretended mortgage from the respondents W. F. Hilcher Sr. and Gertrude Hilcher to the respondent Walter F. Hilcher Jr. in the sum of \$5500.00 and dated February 10th, 1931, and that the property, real and personal, conveyed by said conveyances be decreed and held to be the property of the respondent W. F. Hilcher Sr. and that the said fraudulent conveyances be each decreed to be null and void and cancelled and all of the property thereby conveyed be held subject to the lien of the judgment of the complainant; that said property be sold under the order of this Court to satisfy the lien and judgment of the complainant against the respondent W. F. Hilcher Sr., and if your Complainant has not asked for the proper relief, it further prays that it may have such other and further relief in the premises as the nature of its case shall require and as may be just and equitable.

OFFER TO DO EQUITY

Complainant submits itself to the jurisdiction of the Court and offers to do whatever the Court may consider necessary to be done. On its part towards making the decree which it seeks, just and equitable to the other parties to the suit.

Subscribed for complainant.

a Corporation, the Complainant herein; that he has read and knows the contents of the foregoing bill of complaint and that the facts therein set forth are true, except such as are averred to and upon information and belief and as to these alleges he believes them to be true.



Subscribed in my presence and sworn to before me this 14th day of May, 1936.



Notary Public

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon LOUISE NETTLES, Ashland, Alabama,

of _____ County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

FARMERS & MERCHANTS BANK OF FOLEY

against said LOUISE NETTLES, W. F. HILCHER, SR., GERTRUDE HILCHER,
Hilcher Mercantile Company, Charles G. Hilcher

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 15th day

of May 1936

Robert S. Duck Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Circuit Court, Baldwin County, Ala., IN EQUITY.

PLAINTIFF

VS.

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers			For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.		
Issuing each Subpoena			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof			Each Notice Sent by Mail to Creditors	15	
Entering each return thereof			Filing, Receipting for and Docketing each Claim, etc	25	
For each Order of Publication			For all entries on Subpoena Docket, etc.	50	
Issuing Writ of Injunction			For all entries on Commission Docket, etc.	50	
For each Copy thereof			Making Final Record, per hundred words	15	
Entering each return thereof			Certified Copy of Decree	1 00	
Issuing Writ of Attachment			Report of Divorce to State Health Office Acts 1915	50	
Entering each return thereof			Total Fees of Register		
Docketing each case					
Entering each Appearance			FEEES OF SHERIFF		
Issuing each Decree Pro Confesso on personal service			Serving and Returning Subpoena on Deft.	\$1 50	
Issuing each Decree Pro Confesso on publication			Serving and Returning Subpoena for Witaess	65	
Each Order Appointing Guardian			Levyng Attachment	3 00	
Any other order by Register			Entering and Returing same	25	
Issuing Commission to Take Testimony			Entering and Returning Execution	25	
Receiving and Filing			Selling Property Attached	25	
Endorsing each package			Impaneling Jury	75	
Entering Order Submitting Cause			Executing Writ of Possession	2 50	
Entering any other Order of Court			Collecting Execution for Costs	1 50	
Noting all Testimony			Serving and Returning Sci. Fa., each	65	
Abstract of Cause, etc.			Serving and Returning Notice	65	
Entering each Decree			Serving and Returning Writ of Injunction	1 50	
For Every Hundred Words Over Five Hundred			Serving and Returning Writ of Exeat	1 50	
Taking Account on Reference			Taking and Approving Bonds, each	1 00	
Taking Testimony, etc.			Collecting Money on Execution		
Each Report, Five Hundred Words or less			Making Deed	2 50	
For every Hundred Words Over Five Hundred			Serving and Returning Application	1 00	
Amount Claimed. Less than Five Hundred Dollars, etc.			Serving Attachment, Contempt of Court	1 50	
Issuing each Subpoena			TOTAL FEES OF SHERIFF		
Witaess Certificate, each					
Issuing Execution, each			Recapitulation		
Entering each Return			Register's Fees		
Taking and Approving Bond, each			Sheriff's Fees		
Making Copy of Bill, etc.			Commissioner's Fees		
Each notice not otherwise provided for			Solicitor's Fees		
Each Certificate or Affidavit, with Seal			Witness Fees		
Each Certificate or Affidavit, no Seal			Guardian Ad Litem		
Hearing and passing on application for Receiver or Trustee			Printer's Fees		
Each Settlement with Receiver or Trustee			Trial Tax	3 00	
Examining each Voucher of Receiver or Trustee			Recording Decree in Probate Court		
Examing each Answer on Exception			Total		
Recording Resignation or Suggestion of Death of Trustee					
Entering each Certificate to Supreme Court					
Taking Questions and Answers, etc.					
For all other service relating to such proceedings					
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward					

Received payment this _____ day of _____ 193_____

Register.

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

222 Farm - Mucitah Bond

PLAINTIFF

W F Hulcher et al

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers <i>2</i>	\$	10	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.		
Issuing each Subpoena <i>4</i>		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof <i>4</i>		40	Each Notice Sent by Mail to Creditors.....	15	
Entering each return thereof <i>4</i>		15	Filing, Receipting for and Docketing each Claim, etc	25	
For each Order of Publication.....	1	00	For all entries on Subpoena Docket, etc.....	50	
Issuing Writ of Injunction.....	1	50	For all entries on Commission Docket, etc.....	50	
For each Copy thereof.....		50	Making Final Record, per hundred words.....	15	
Entering each return thereof.....		15	Certified Copy of Decree.....	1	00
Issuing Writ of Attachment.....	1	00	Report of Divorce to State Health Office.....	50	
Entering each return thereof.....		15	Acts 1915		
Docketing each case.....	1	00	Total Fees of Register		<i>590</i>
Entering each Appearance.....		25			<i>1090</i>
Issuing each Decree Pro Confesso on personal service.....	1	00	FEEES OF SHERIFF		
Issuing each Decree Pro Confesso on publication.....	1	00	Serving and Returning Subpoena on Deft. <i>4</i>	\$	150
Each Order Appointing Guardian.....	1	00	Serving and Returning Subpoena for Witness.....		65
Any other order by Register.....		50	Levying Attachment.....		300
Issuing Commission to Take Testimony.....		50	Entering and Returning same.....		25
Receiving and Filing.....		10	Entering and Returning Execution.....		25
Endorsing each package.....		10	Selling Property Attached.....		25
Entering Order Submitting Cause.....		50	Impaneling Jury.....		75
Entering any other Order of Court.....		25	Executing Writ of Possession.....		250
Noting all Testimony.....		50	Collecting Execution for Costs.....		150
Abstract of Cause, etc.....	1	00	Serving and Returning Sci. Fa., each.....		65
Entering each Decree.....		75	Serving and Returning Notice.....		65
For Every Hundred Words Over Five Hundred.....		15	Serving and Returning Writ of Injunction.....		150
Taking Account on Reference.....	3	00	Serving and Returning Writ of Exeat.....		150
Taking Testimony, etc.....		15	Taking and Approving Bonds, each.....		100
Each Report, Five Hundred Words or less.....	2	50	Collecting Money on Execution.....		
For every Hundred Words Over Five Hundred.....		15	Making Deed.....		250
Amount Claimed, Less than Five Hundred Dollars, etc.....	2	00	Serving and Returning Application.....		100
Issuing each Subpoena.....		25	Serving Attachment, Contempt of Court.....		150
Witness Certificate, each.....		25			
Issuing Execution, each.....		75	TOTAL FEES OF SHERIFF		
Entering each Return.....		15			<i>600</i>
Taking and Approving Bond, each.....	1	00	Recapitulation		
Making Copy of Bill, etc.....		15	Register's Fees.....		<i>1090</i>
Each notice not otherwise provided for.....		50	Sheriff's Fees.....		<i>600</i>
Each Certificate or Affidavit, with Seal.....		50	Commissioner's Fees.....		
Each Certificate or Affidavit, no Seal.....		25	Solicitor's Fees.....		
Hearing and passing on application for Receiver or Trustee.....	3	00	Witness Fees.....		
Each Settlement with Receiver or Trustee.....	3	00	Guardian Ad Litem.....		
Examining each Voucher of Receiver or Trustee.....		10	Printer's Fees.....		
Examining each Answer on Exception.....	3	00	Trial Tax.....		300
Recording Resignation or Suggestion of Death of Trustee.....		75	Recording Decree in Probate Court.....		<i>1990</i>
Entering each Certificate to Supreme Court.....		50			
Taking Questions and Answers, etc.....		25	Total		
For all other service relating to such proceedings.....	1	00			<i>1190</i>
For service in proceeding to relieve minors, etc. same fee as in similar cases.					<i>3180</i>
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward - - -					

Received payment this *15* day of *June* 193*6* *R. H. Hulcher* Register.

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon W. P. SLOAN, SR., GEORGE W. SLOAN, JR.,
THE SLOAN MANUFACTURING COMPANY, CHARLES G. SLOAN

of BALDWIN County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

THE SLOAN MANUFACTURING COMPANY, CHARLES G. SLOAN

against said W. P. SLOAN, SR., GEORGE W. SLOAN, JR., THE SLOAN MANUFACTURING
COMPANY, CHARLES G. SLOAN

and further to do and perform what said Judge shall order and direct in that behalf. And this the said
Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with
your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 15th day
of May 1936

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

The State of Alabama, }
Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ~~W. F. HILGNER, SR., GEORGE HILGNER, HILGNER MERCHANTILE COMPANY, CHARLES G. HILGNER~~

of DALEWOOD County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

HILGNER MERCHANTILE COMPANY, CHARLES G. HILGNER

against said W. F. HILGNER, SR., GEORGE HILGNER, HILGNER MERCHANTILE COMPANY, CHARLES G. HILGNER

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 18th day of May 1936

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

out of State

Serve on Charles G. Miller

Circuit Court of Baldwin County
IN EQUITY

No. _____

S U M M O N S

VS.

RECORDED
books

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with

Defendant

Sheriff

By _____
Deputy Sheriff

Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

Book

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

Furness + Mercantile

Bank of Foley

VS.

Nichols et al

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this

15th

day of

May

1932

[Signature]

SHERIFF

Executed this

19th

day of

May

1932

by leaving a copy of the within Summons with

W. J. Kilborn Jr.
Deputy Sheriff and
the Nichols mercantile &
by service on *[Signature]*
Defendant

[Signature]

Sheriff

By _____

Deputy Sheriff

Charles Nichols out

J. Stak

[Signature]

David A. Meagley
Solicitor for Complainant

Recorded in Vol. _____

Page _____

Circuit Court, Baldwin County, Ala.
In Equity.

No. 223

*Ferns Markets
Bank*

VS.

Alabama Canal

Cost Bill

Paid _____ 193

Register.

*10.90
11.05*

Circuit Court, Baldwin County, Ala.
In Equity.

No.

VS.

Cost Bill

Paid _____, 193

Register.

Alabama, Ala.

Serve on *Louise Nettles*

Circuit Court of Baldwin County
IN EQUITY

No. _____

S U M M O N S

VS.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

DED

Book

RECORDED 6 - 393

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this 22 day of

May 1936

by leaving a copy of the within Summons with

Louise Nettles

Defendant

W. M. Mayo
Sheriff

By W. M. Mayo
Deputy Sheriff