

W. J. PHILLIPS

Plaintiff,

-vs-

R. H. VAUGHN JR.

Defendant.

IN THE CIRCUIT COURT-LAS. SIDE.

BALDWIN COUNTY,

ALABAMA.

A F F I D A V I T.

Before me, John Rason, a Notary Public in and for Baldwin County, Alabama, personally appeared W. J. Phillips, who is known to me and who, after being by me first duly and legally sworn, doth depose and says under oath as follows: that he is W. J. Phillips and the plaintiff in the above styled cause and as such is duly authorized to make affidavit; that the following property, to-wit:-

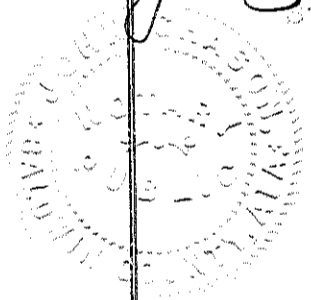
One Farnall M Tractor, Complete. Motor No. FDM 46436.

for the recovery of which he has instituted suit this day in the Circuit Court of Baldwin County, Alabama, is the property of said plaintiff.

W J Phillips

Subscribed and sworn to before me, this 9 day of May, 1944.

John Rason
Notary Public, Baldwin County,
State of Alabama.



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RECORDED
AFFIDAVIT AND BOND

W. J. PHILLIPS

Plaintiff,

--VS--

R. H. VAUGHN JR.

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

BALLWIN COUNTY,

ALABAMA.

Filed May 9, 1944

R. Duval
Clerk.

LAW OFFICES
HYBART & CHASON
Bay Minette, Alabama

STATE OF ALABAMA,

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That W. J. Phillips as Principal and the undersigned as sureties, are held and firmly bound unto R. H. Vaughn Jr., his heirs, executors and administrators, in the sum of Twenty-five Dollars (\$25.00), for the payment of which well and truly to be made we bind ourselves our and each of our heirs, successors, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seal and dated this 9 day of May, 1944.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH that whereas the above bound W. J. Phillips has, on this day, sued out from the Office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue returnable at the next term of the Circuit Court of Baldwin County, Alabama, in said Court against the said R. H. Vaughn Jr. for the recovery of the following described personal property, viz:-

One Farmall ^{Tractor} ~~Tractor~~ complete. Motor No. FBM 46438.

Now if the said W. J. Phillips shall fail in said suit he shall pay to the said R. H. Vaughn Jr., the Defendant in said suit; all such costs and damages as he may sustain by the wrongful complaint.

W. J. Phillips (SEAL)

F. C. Toler (SEAL)

H. F. Gullidge (SEAL)

Taken and approved this
the 9 day of May, 1944.

R. H. Vaughn
Clerk of the Circuit
Court, Baldwin County,
Alabama.

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MASON PLAN COMPANY, INC., A
CORPORATION,

PLAINTIFF

VS

ROSS F. WALKER,
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

And now comes the Defendant Ross F. Walker and for answer to
the Plaintiff's complaint, says:

1.

The facts therein alleged are untrue.

BEEBE & HALL

By

Shirley
Attorneys for Defendant.

Defendant demands trial by jury.

MASON PLAN COMPANY, INC.,
A CORPORATION
PLAINTIFF

VS

MRS. ROSS F. WALKER A ND
ROSS R. WALKER,
DEFENDANTS

ANSWER OF DEFENDANT
ROSS W. WALKER.

271944
W. Walker

MASON PLAN COMPANY, INC., A
CORPORATION
PLAINTIFF

VS

MRS. ROSS F. WALKER AND
ROSS F. WALKER, JOINTLY
AND SEVERALLY,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

And now comes the Defendant, Mrs. Ross F. Walker, and for
answer to the Plaintiff's complaint says:

1.

The facts therein alleged are untrue.

2.

That the note sued on was to secure the indebtedness of
the Defendant Ross F. Walker and not the debt of this Defendant and
that this Defendant executed the said note only as surety for her
husband, Ross F. Walker.

BEEBE & HALL

By *W. L. Hall*
Attorneys for Defendants

Defendant demands a trial by jury.

MASON PLAN COMPANY, INC., A
CORPORATION PLAINTIFF

VS

MRS. ROSS F. WALKER AND ROSS
ROSS F. WALKER,
DEFENDANTS

ANSWER OF DEFENDANT
MRS. ROSS R. WALKER.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, { No. 858.
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

April. TERM, 194 4

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs Ross F Walker. and Ross F Walker.

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

Mrs Ross F Walker. and Ross F Walker., Defendant

by Morgan Plan Company Inc. a Corp.,

Plaintiff

Witness my hand this 14th day of April. 194 4

Reduch

Clerk.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

MASON PLAN CO.

Plaintiffs

vs.

Mrs Ross F Walker, and

Ross F Walker,

Defendants

SUMMONS AND COMPLAINT

Filed April, 14th 1944

R S Duck,

Clerk

J B Blackburn,

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minetto, Ala.

Defendant lives at

RECEIVED IN OFFICE

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Sheriff

I have executed this summons

this

April 21

1944

by leaving a copy with

Mrs. Ross F. Walker
and Ross F. Walker

Sheriff

Deputy Sheriff

MASON PLAN COMPANY, INC.,
a corporation,

Plaintiff,

-vs-

MRS. ROSS F. WALKER and
ROSS F. WALKER, jointly
and individually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

COUNT ONE -

Plaintiff claims of the defendants the sum of Three
Hundred Thirty and no/100 (\$330.00) Dollars, due by promissory
note dated April 22, 1943, and now due and payable.

Plaintiff claims benefit of waivers of exemption made
in said note by defendants.

Plaintiff also claims a reasonable attorney's fee,
averring that Forty-nine and 50/100 (\$49.50) Dollars is a
reasonable fee, which said fee defendants agreed in said note
to pay.


ATTORNEY FOR PLAINTIFF

Defendant's address:
Route 1
Robertsdale, Alabama