

1084

COMPLAINT

E.M.Boone |  
Pl. |  
vs |

Circuit Court of Baldwin County Alabama

E.A.Stokes |  
Def. |

Twenty-First Judicial Circuit

The Plaintiff claims of the Defendant the sum of \$179.57 for work and labor done for the Defendant by the Plaintiff at his request on, to-wit, July 1, 1947 in repairing one 1941 Buick Senatze, 8 cylinder, 2 Door and 2 Tone Gray, which said sum of \$179.57 with the interest thereon is still due and unpaid.

And Plaintiff claims a lien on said truck for the payment of said debt and asks that the same be established and the said truck condemned and ordered sold for the satisfaction of said debt and interest together with costs in the case.

This 30 day of August, 1947.

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Attorney for Plaintiff

No

Complaint

E.M.Boone

vs

E.A.Stokes

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

No.-----

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon E.A.Stokes

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 him as

\_\_\_\_\_, Defendant.---

by E.M.Boone

\_\_\_\_\_, Plaintiff.---

Witness my hand this

3<sup>rd</sup>

day of

Sept

194

7

Alice J. Leach, Clerk

(Miss Hope)

No. 1084

Page

THE STATE of ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

E.M. Boone

Plaintiffs

vs.

E.A. Stokes

Defendants

SUMMONS and COMPLAINT

Filed

9-3

1947

Alice J. Leach Clerk

Robert M. Mundine

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minette, Ala.

Defendant lives at

Fairhope Alabama

RECEIVED IN OFFICE

Sept 4, 1947

Taylor Wilkins Sheriff  
I have executed this summons

this 9-10 1947  
by leaving a copy with

E.A. Stokes

Taylor Wilkins Sheriff  
J. F. Hall Deputy Sheriff

**The State of Alabama,** {  
Baldwin County.

## CIRCUIT COURT AT BAY MINETTE, ALA.

Know all Men by these Presents, That we, E.M. Boone and

....., of the County of Baldwin .....

are held and firmly bound unto E.A. Stokes

in the sum of Three Hundred and Sixty ..... Dollars, to

be paid to the said E.A. Stokes, his

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

Sealed with our seals and dated the ..... day of ....., 1927

## The Condition of this Obligation is such:

That whereas, the above bounden, E.M. Boone

..... has, on the day of the date  
hereof, prayed an Attachment at the suit of himself

..... against the estate of above named

E.A. Stokes

for the sum of One Hundred Seventy-Nine and 57/100 ..... Dollars,  
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said E.M. Boone  
should prosecute said Attachment to effect, and pay the said Defendant all such damages as he  
may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be  
void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have  
now, or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

E. M. Boone ..... (Seal)

H. P. Chubb ..... (Seal)

Allen S. Rinton ..... (Seal)

..... (Seal)

Approved, this 3rd day of Sept, 1927

Alice J. Luck ..... Clerk.

The State of Alabama, {  
Baldwin County.

## CIRCUIT COURT AT BAY MINETTE, ALA.

Before me, Robert M. Mundine, a Notary Publicin and for said County, personally appeared E. M. Boonewho, being duly sworn, on oath saith that E. A. Stokes, is

justly indebted to

him

in the sum of One Hundred Seventy-Nine and 57/100 Dollars, which said amount is justly due after allowing all just offsets and discounts, and that the said E. M. Boone contributed labor and material to the repair of one 1941 Model Buick Sedanette, 8 cylinder, 2 Tone Gray, 2 Door automobile on to-wit; July 1, 1947, owned by the said E. A. Stokes, said work at his request, in the amount of \$179.57 which said sum with interest remains due and unpaid.

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

Subscribed and sworn to before me this 30 day of Aug, 19247.E. M. BooneRobert M. Mundine N.P.No. 1084

The State of Alabama,

Baldwin County.

CIRCUIT COURT  
AT BAY MINETTE, ALA.E. M. Boone  
TO

E. A. Stokes

Attachment Bond and Affidavit

Filed this the 30 dayof Sept, 19247Deicy Luck Clerk.

Robert M. Mundine

Attorney.

ATTACHMENT.

**The State of Alabama,**  
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, E.M.Boone

hath complained on oath ~~to me, ROBERT S. DUCK, Clerk of Circuit Court of Baldwin County, Ala.~~

that E.A.Stokes

is justly indebted to the Plaintiff E.M.Boone

in the sum of One Hundred Seventy Nine and 57/100 Dollars, and

has having made affidavit and given bond

as required by law, in such cases, you are hereby commanded to attach ~~some part of the estate of~~  
One 1941 Buick Senatte, 8 cylinder, 2 Tone Gray, 2 Door  
automobile,

~~as will be provided by the law of this State~~ 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 \_\_\_\_\_ 1937

next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 3rd day of Sept A. D. 1937

Alice J. Duck Clerk.

Received in Sheriff's Office  
this 4 day of Sept, 1947  
TAYLOR WILKINS, Sheriff

*Executed 9-10-47  
By attaching and  
taking into my  
possession the  
within described  
property*

*Taylor Wilkins Sheriff  
147 Wall P.O.*

No. 1084

## ATTACHMENT

E.M. Boone

Vs.

{ ATTACHMENT

E.A. Stokes

Issued

9 3

, 1947

MOORE PRINTING CO.,