

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

No.-----

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

1085

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon J.A. Martin

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 3rd day of Sept 1947

Alice J. Luck, Clerk

No. 1085 Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

E. M. Boone Plaintiffs

vs.

J. A. Martin

Defendants

SUMMONS and COMPLAINT

Filed 9-3, 1947

Alice J. Wecker Clerk

Robert M. Munday Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

_____, 194_____

Sheriff

I have executed this summons

this 9-8 1947
by leaving a copy with

J. A. Martin

Taylor Wilkins Sheriff

H. F. Hall Deputy Sheriff

COMPLAINT

E.M.Boone
Plaintiff

vs

J.A.Martin
Defendant

CIRCUIT COURT OF BALDWIN COUNTY ALABAMA

Twenty-First Judicial Circuit

The Plaintiff claims of the Defendant the sum of \$112.15 for work and labor done for the Defendant by the Plaintiff on, to-wit, July 1, 1947 at Defendant's request in repairing one 1940 Model 1½ Ton Ford Truck with long wheel base, no grill, 2 speed axel, right cab door off and army body, which sum of \$112.15 with the interest thereon is still due and unpaid.

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

This 30 day of August, 1947.

Robert M. Mendenhall
Attorney For Plaintiff

Complaint

No. _____

Civil

E.M.Boone

vs

J.A.Martin

Filed
9.3-47
Alice J. Welch
clerk

The State of Alabama, {
Baldwin County.

CIRCUIT COURT AT BAY MINETTE, ALA.

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

....., of the County of Baldwin

are held and firmly bound unto J.A. Martin

in the sum of Two Hundred and Thirty Dollars, to

be paid to the said J.A. Martin, 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, 1947

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

J.A. Martin

for the sum of One Hundred and Twelve and 15/100 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 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.D. Childers (Seal)

Alton S. Martin (Seal)

..... (Seal)

Approved, this 3rd day of Sept, 1947

Alice J. Reuck Clerk.

The State of Alabama, }
Baldwin County.

CIRCUIT COURT AT BAY MINETTE, ALA.

Before me, Robert M. Mundine, a Notary Public
in and for said County, personally appeared E.M. Boone
who, being duly sworn, on oath saith that J.A. Martin is
justly indebted to
him

in the sum of One Hundred Twelve and 15/100 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 repairs of one 1940 Model
Ford 1 1/2 Ton Truck with long wheel base, no grill, 2 speed axel,
right ~~side~~ off and with an army body, on to-wit, July 1, 1947, owned
by the said J.A. Martin, said labor and material at his request
to the true value of \$112.15 which 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 August 1947

E.M. Boone.

Robert M. Mundine

Notary Public.

No. 1085

The State of Alabama,
Baldwin County.

CIRCUIT COURT
AT BAY MINETTE, ALA.

E.M. Boone

TO

J.A. Martin

Attachment Bond and Affidavit

Filed this the 3rd day

of Sept 1947

Alicy Bluckey
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 J.A.Martin

is justly indebted to the Plaintiff E.M.Boone

in the sum of \$112.15 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~~

One 1940 Model 1 1/2 Ton Ford Truck with long wheel base, no grill, 2 speed axel, right cab door off and with army body.

~~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 1937

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

WITNESS, my hand, this 32d day of Sept A. D. 1937

Alice J. Duck Clerk.

Executed 9-8-47
By attaching the
within described
property and taking
into my possession

Taylor Wilkins Sheriff
147 Wall P.S.

No. _____

ATTACHMENT

E.M. Boone

Vs. { ATTACHMENT

J.A. Martin

Issued 9-3- _____, 1947

MOORE PRINTING CO.