LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY FAIRHOPE, ALABAMA



E.G. RICKARBY, JR.

April 29, 1948

Mrs. Alice J. Duck Clerk Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

BANK OF FAIRHOPE -vs- JOE HORACE STRONG, Jr.: With this we send you affidavit and bond for garnishment, Writ of garnishment and notices to defendant, together with Summons and Complaint.

We have dated these papers tomorrow, when this will reach you and ask that the Writ of Garnishment be issued at once and that you see that it is served, if possible, before Saturday monring.

The Bank and ourselves will appreciate your giving this immediate attention in this very busy time.

Sincerely,

for:

RICKARBY & RICKARBY

EGR:la 7 encls.

September 28, 1948

Mrs. Alice J. Duck Clerk Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

Request the following cases be dismissed.

PHILSON PRODUCTS -vs- EDWARD W. ENGEL

MURIELS SPORTWEAR -vs- EDWARD W. ENGEL

THE BANK OF FAIRHOPE -vs- JOE HORACE STRONG, Jr.

THE BANK OF FAIRHOPE -vs- PAMMIE LEE FOWLER

You will find the costs have been paid in all these cases.

Yours very truly,

RICKARBY & RICKARBY

by:- Paladane

EGR,jr:rs

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380

387

THE STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, THE BANK OF FAIRHOPE, as principal, and KIRBY WHARTON and
HENRY G. BISHOP, as surety, are held and firmly bound unto
JOE HORACE STRONG, Jrin the sum of
Dollars and costs, to be paid to the said
JOE HORACE STRONG, Jrhis heirs, executors, adminis-
trators and assigns; for which payment, well and truly to be made, we bind ourselves and each of us, our
heirs, executors and administrators jointly, severally and firmly by these presents.
Sealed with our seals and dated this 29th day of April, in the year of
our Lord, One Thousand, Nine Hundred and Forty-eight.
The condition of the above obligations is such, that, whereas the above bound
BANK OF FAIRHOPE has on the day of the
above date, commenced suit in the court of Baldwin County, Alabama returnable XX
thirty days after service txxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
Strong, Jr.
the sum of Dollars,
and the said Plaintiff has prayed a Garnishment in said case, as provided by law.
Now, if said Plaintiff shall prosecute this suit to effect, and pay all such damages and costs to
Defendant as he may sustain by the wrongful suing out of said Garnishment, this obligation to be void,
otherwise to remain in full force and effect.
Approved this 30th day of L. S. Approved this 1. S.
april A. D. 1948
acice rench xxx Her Atemporal Shaff I. S.
THE STATE OF ALABAMA!
Raldwin County
Personally Appeared Before Me, ELLIOTT G. RICKARBY a XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
the County and State aforesaid KIRBY WHARTON and HENRY G. BISHOP
who, being duly sworn, deposeth and saith that JOE HORACE STRONG, Jr.
is justly indebted to the Bank of Fairhope
in the sum of Dollars,
thirty days after servi
and that he has commenced suit by summens and complaint returnable of the court of the county, and believes the
process of Garnishment is necessary to obtain satisfaction of said debt, thatThe
Gaston Motor Company, Fairhope, Ala. is or is supposed to be indebted to the said
JOE HORACE STRONG, Jr. or has effects or money of
the said Defendant in his hands.
Sworn to and subscribed before me this 29th
day of April, 1948. Click S. Pin L. XXX
XXXX XXX
Notary Public, Baldwin County, Alabama

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Baldwin County							
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STATE OF ALABAMA,
BALDWIN COUNTY

JOE HORACE STRONG, Jr. , Defendant :

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

The BANK OF FAIRHOPE , Plaintiff ,

versus JOE HORACE STRONG, Jr. , Defendant ,

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which.....The Gaston......

Motor Company, Fairhope, Alabama

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 30%.

has.... been named as Garnishee......

Clerk of the Circuit Court.

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Ire Horace strong for	-	RECORDED NOTICE
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	ر	CLERK OF CIRCUIT COURT
	-	BALDWIN COUNTY, ALABAMA
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	And the second s	JOE HORACE STRONG, Jr.
		The BANK OF FAIRHOPE,
		Plaintiff
ø .		vs.
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	1	JOE HORACE STRONG, Jr.,
garanna an t-		Defendant
	Manuscript — markets	GASTON MOTOR COMPANY, Garnishee
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SUMMONS AND COMPLAINT
THE STATE OF ALABAMA:
COUNTY OF BALDWIN:

No. _____, L A W

April 30, 1948

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

JOE HORACE STRONG, Jr.

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, Ala., against him as Defendant by BANK OF FAIRHOPE, as Plaintiff.

Witness my hand this the 30th day of April, 1948.

Alice Lench

BANK OF FAIRHOPE, a Corporation, Plaintiff JOE HORACE STRONG, Jr.,
Defendant

-VS-

The Plaintiff claims of the Defendant THREE HUNDRED NINETY-THREE and 67/100 DOLLARS, due by promissory note made by him on the 20th day of December, 1947, and payable on the 19th day of January, 1948, with interest thereon.

Plaintiff further shows that said note by its terms provided for the payment of a reasonable attorney's fee, if same be not paid at maturity and for which Plaintiff now claims in the further sum of \$50.00.

Ring + Pin Carly
Attorneys for Plaintiff.

RECORDED

No. 1/87
THE STATE OF ALABAMA BALDWIN COUNTY CIRCUIT COURT BANK OF FAIRHOPE, a Corporation, Plaintiff -VS-JOE HORACE STRONG, Jr., Defendant GASTON MOTOR CO., Garnishee. SUMMONS AND COMPLAINT Filed_ Defendant lives at Fairhope, Alabama

RICKARBY & RICKARBY, Plaintiff's Attorney

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Tayla Wilhins, Sheriff