

SAMUEL N. NELSON AND  
URSULA C. NELSON

PLAINTIFFS

VS

ANTONIE STUCKLY AND  
JOSEPH STUCKLY

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1625

Now come the Defendants separately and severally and demurs to the  
Plaintiffs' complaint, consisting of one count and to each allegation  
therein contained and for grounds of said demurrer say:

1.


That said count does not state a cause of action.

2.


That said count shows on its face that the account sued on is  
barred by the Statutes of Limitation.

3.

That said count shows on its face that the account sued on is barred  
by the Statutes of Limitations by three years.

  
Attorney for Defendants

The Defendants demand a trial by jury.

  
Attorney for Defendants.

RECORDED

SAMUEL N. NELSON AND  
URSULA C. NELSON

PLAINTIFFS

VS

ANTONIE STUCKLY AND  
JOSEPH STUCKLY

DEFENDANTS

DEMURRERS

FILED  
APR 12 1951  
ALICE J. DUCK, Clerk

## BOND

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

That we, Samuel N. Nelson, Mrs. Ursula C. Nelson, George  
Lyrene and Edward Lyrene

are held and firmly bound unto Antonie Stuckly and Joseph Stuckly

in the sum of Five Thousand ----- DOLLARS,

to be paid to the said Antonie Stuckly and Joseph Stuckly

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, severally and firmly by these Presents.

Sealed with our seals, and dated this ----- day of ----- 1925

The Condition of the Above Obligation is Such, That whereas, the above bound Samuel N. Nelson and Ursula C. Nelson have commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Antonie Stuckly and Joseph Stuckly

the sum of Two Thousand Five Hundred ----- Dollars,

and have ----- on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to Central Baldwin Bank and Baldwin County Savings & Loan Assn.

summoning them to answer what they are indebted to said Defendants, -----

----- or what effects of said Defendants, ----- they may ----- have

in their possession, or under their control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiffs shall prosecute the Garnishment to effect, and pay the Defendants all such costs and damages as they may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we

do hereby severally certify that we ----- have property free from all incumbrance, to the full amount of the above bond.

Ursula C. Nelson ----- (Seal)

George Lyrene ----- (Seal)

Edward Lyrene ----- (Seal)

Approved this 31<sup>st</sup> day of March A. D., 1925.

Heriberto ----- Clerk.

THE STATE OF ALABAMA,  
Baldwin County.

Before me, \_\_\_\_\_

in and for said County, personally appeared \_\_\_\_\_

who, being duly sworn, doth depose... and say... that \_\_\_\_\_

indebted to \_\_\_\_\_

in the sum of \_\_\_\_\_ DOLLARS

and that \_\_\_\_\_ ha \_\_\_\_\_ commenced a suit by summons and complaint on said indebtedness against the said \_\_\_\_\_

and that \_\_\_\_\_

supposed to be indebted to the said Defendant \_\_\_\_\_

or to have effects of the said Defendant \_\_\_\_\_

in \_\_\_\_\_ possession, or under \_\_\_\_\_ control, and that \_\_\_\_\_ believes that process of Garnishment against the said \_\_\_\_\_

is necessary to obtain satisfaction of said claim: and that the said \_\_\_\_\_

\_\_\_\_\_ is believed to be chargeable as Garnishee in said cause, and that this Writ is not sued out for the purpose of vexing or harassing said Defendant \_\_\_\_\_,

or other improper motives.

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_ 192 \_\_\_\_\_

RECORDED  
116

NO. \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

Samuel N. Nelson and

Ursula C. Nelson

PLANTIFF

TO

Antonie Stuckly

Joseph Stuckly

DEFENDANT

Bond and Affidavit in Garnishment on Summons

Filed This \_\_\_\_\_ Day of \_\_\_\_\_

March 1927

W. J. Stuckly CLERK

BOND

The State of Alabama, {  
BALDWIN COUNTY.

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Samuel N. Nelson, and Ursula C. Nelson

*J. G. Starr*

and George Lyrene

are held and firmly bound unto Antonie Stuckly and Joseph Stuckly

in the sum of Five Thousand and No/100 - - - - - DOLLARS,

to be paid to the said Antonie Stuckly and Joseph Stuckly

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, severally and firmly by these Presents.

Sealed with our seals, and dated this 7th day of March 1951

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound

Samuel N. Nelson, and Ursula C. Nelson

have commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Antonie Stuckly and Joseph Stuckly

the sum of Two Thousand and Five Hundred and No/100 - - - - - Dollars,

and have on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

Central Baldwin Bank and Baldwin County Savings and Loan Association

summoning them to answer what they are indebted to said Defendant, or what effects of said Defendant

they have in their possession, or under their control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the

next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as they may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we do hereby severally certify that we have property free from all incumbrance, to the full amount of the above bond.

Approved this 8th day of

March A. D., 1951

*J. G. Starr* (Seal)  
*George Lyrene* (Seal)  
*S. N. Nelson* (Seal)  
*Ursula C. Nelson*  
*W. J. W. W. W. W.* Clerk

The State of Alabama, {  
BALDWIN COUNTY.

Before me, T. W. RICHESON, Clerk of Circuit Court,

in and for said County, personally appeared \_\_\_\_\_

who, being duly sworn, doth depose \_\_\_\_\_ and say \_\_\_\_\_ that \_\_\_\_\_

indebted to \_\_\_\_\_ in the sum of \_\_\_\_\_ Dollars,  
and that \_\_\_\_\_ ha \_\_\_\_\_ commenced on suit by summons and complaint on said indebtedness  
against the said \_\_\_\_\_

and that \_\_\_\_\_

supposed to be indebted to the said Defendant \_\_\_\_\_, or to have effects of the said Defendant \_\_\_\_\_, in \_\_\_\_\_  
possession, or under \_\_\_\_\_ control, and that \_\_\_\_\_ believe that process of Garnishment against the said

is necessary to obtain satisfaction of said claim; and that the said \_\_\_\_\_  
is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose of vexing or  
harassing said Defendant \_\_\_\_\_, or other improper motives.

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

\_\_\_\_\_ Clerk Circuit Court.

116.

No. \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT

Plaintiff \_\_\_\_\_

TO

Defendant \_\_\_\_\_

Bond and Affidavit in Garnishment on Summons

Filed this \_\_\_\_\_ day of \_\_\_\_\_

19 \_\_\_\_\_

Clerk \_\_\_\_\_

Baldwin Times Print.

The State of Alabama,  
BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas Samuel N. Nelson and Ursula C. Nelson  
has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court  
of said County, against Antonie Stuckly and Joseph Stuckly  
for the sum of Two Thousand, Five Hundred - - - - Dollars and whereas, the said  
Samuel N. Nelson and Ursula C. Nelson  
has entered into bond, and made affidavit as required by law that the said Antonie  
Stuckly and Joseph Stuckly  
is indebted to them in the sum of Two Thousand, Five Hundred - - - -  
Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such  
judgment as may be recovered by Plaintiff, and that the Baldwin County Savings and  
Loan Association, Robertsedale, Alabama  
is believed to be Chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Baldwin County  
Savings and Loan Association, Robertsedale, Alabama  
to be and appear at the \_\_\_\_\_ term of the Circuit Court, to  
be holden for the County of Baldwin, on \_\_\_\_\_, 19\_\_\_\_,  
then and there to answer, upon oath, whether, at the time of the service of this garnishment, or  
at the time of making your answer, or at any time intervening between the time of serving the  
garnishment and making the answer, you were indebted to the defendant, and whether, you  
will not be indebted to him in the future by a contract then existing, and whether by a contract  
then existing, you are liable to him for the delivery of personal property, or for the payment of  
money which may be discharged by the delivery of personal property, or which is payable in  
personal property, and whether you have not in your possession or under your control money or  
effects belonging to the defendant.

Witness my hand this 8<sup>th</sup> day of March, 1927

Alvin J. Lomax  
Clerk.

4-4-51

original

RECORDED  
No. 1625

Circuit Court Of  
Baldwin County

vs. } Garnishment On Summons

Issued 8<sup>th</sup> day of March, 1951

A. B. Miller  
Plaintiff's Attorney.

Printed By The Baldwin Times

Executed 4-4-51 By  
Ferving copy of the  
within Garnishment  
Summons on  
Baldwin County Savings  
& Loan Association

Taylor Wilkins Sheriff  
Edlough Steadham P.S.



The State of Alabama,  
BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas Samuel N. Nelson and Mrs. Ursula C. Nelson  
has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court  
of said County, against Antonie Stuckly and Joseph Stuckly  
for the sum of Two Thousand, Five Hundred - - - - - Dollars and whereas, the said  
Samuel N. Nelson and Ursula C. Nelson  
has entered into bond, and made affidavit as required by law that the said Antonie  
Stuckly and Joseph Stuckly  
is indebted to them in the sum of Two Thousand, Five Hundred - - - - -  
Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such  
judgment as may be recovered by Plaintiff, and that Central Baldwin Bank,  
Robertsdale, Alabama

\_\_\_\_\_ is believed to be Chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Central Baldwin  
Bank, Robertsdale, Alabama.

\_\_\_\_\_ to be and appear at the \_\_\_\_\_ term of the Circuit Court, to  
be holden for the County of Baldwin, on \_\_\_\_\_, 19\_\_\_\_,  
then and there to answer, upon oath, whether, at the time of the service of this garnishment, or  
at the time of making your answer, or at any time intervening between the time of serving the  
garnishment and making the answer, you were indebted to the defendant, and whether, you  
will not be indebted to him in the future by a contract then existing, and whether by a contract  
then existing, you are liable to him for the delivery of personal property, or for the payment of  
money which may be discharged by the delivery of personal property, or which is payable in  
personal property, and whether you have not in your possession or under your control money or  
effects belonging to the defendant.

Witness my hand this 8th day of March, 1937.

Asie J. Nichols  
Clerk.

$$\begin{aligned} \text{Re}(x) &= x + (-x), \\ \text{Im}(x) &= x - \text{Re}(x). \end{aligned}$$

STATE OF ALABAMA,  
BALDWIN COUNTY

TO Antonie Stuckly, Defendant :

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

~~Antonie Stuckly~~ Samuel Nelson and Ursula Nelson, Plaintiff.....

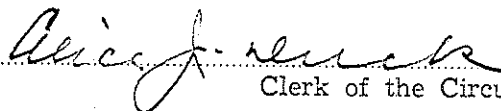
versus Antonie Stuckly and Joseph Stuckly, Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which Central Baldwin Bank  
and Baldwin County Savings and Loan Association

have been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 8th

day of March, 1945.



Clerk of the Circuit Court.

14-14-51

14235

*original*

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

.....  
.....  
.....  
.....

Plaintiff .....

VS.

.....  
.....  
.....  
.....

Defendant.....

*Presented 11-14-51 by  
receiving copy of the  
written notice to D.F.  
on Antenna Study  
Taylor Williams & Kemp  
By Collyer & Steadman D.S.*

STATE OF ALABAMA,  
BALDWIN COUNTY

TO Joseph Stuckly, Defendant :

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

Samuel Nelson and Ursula Nelson, Plaintiff,

versus Antonie Stuckly and Joseph Stuckly, Defendant,

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

Central Baldwin Bank and Baldwin County Savings And Loan Association

have been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 8th

day of ~~March~~ March, 1945.

Alicia Stuckly  
Clerk of the Circuit Court.

4-4-51

Entered 4-4-51 By  
serving copy of the  
with notice on  
Stuckley

Jayln Wilkins Shipp  
College Station D. S.

1625

1625-  
original

NOTICE  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO

RECORDED

Plaintiff .....

VS.

Defendant.....

BOND

The State of Alabama, {  
BALDWIN COUNTY.

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Samuel N. Nelson, and Ursula C. Nelson, *J. G. Starr*  
*and George Lyrene*  
are held and firmly bound unto Antonie Stuckly and Joseph Stuckly

in the sum of Five Thousand and No/100 - - - - - DOLLARS,  
to be paid to the said Antonie Stuckly and Joseph Stuckly, *J. G. Starr*  
*and George Lyrene*

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, severally and firmly by these Presents.

Sealed with our seals, and dated this 7th day of March 1951.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound

Samuel N. Nelson, and Ursula C. Nelson

have commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Antonie Stuckly and Joseph Stuckly

the sum of Two Thousand and Five Hundred and No/100 - - - - - Dollars,

and have on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

Central Baldwin Bank and Baldwin County Savings and Loan Association

summoning them to answer what they are indebted to said Defendant, or what effects of said Defendant

they have in their possession, or under their control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiffs shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as they may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we do hereby severally certify that we have property free from all incumbrance, to the full amount of the above bond.

*J. G. Starr* (Seal)  
*George Lyrene* (Seal)  
*S. N. Nelson* (Seal)  
*Ursula C. Nelson*

Approved this \_\_\_\_\_ day of \_\_\_\_\_ A. D., 19\_\_\_\_

Clerk.

The State of Alabama, {  
BALDWIN COUNTY.

Before me, T. W. RICHERSON, Clerk of Circuit Court,

in and for said County, personally appeared \_\_\_\_\_

who, being duly sworn, doth depose \_\_\_\_\_ and say \_\_\_\_\_ that \_\_\_\_\_

indebted to \_\_\_\_\_ in the sum of \_\_\_\_\_ Dollars,

and that \_\_\_\_\_ ha \_\_\_\_\_ commenced on suit by summons and complaint on said indebtedness against the said \_\_\_\_\_

and that \_\_\_\_\_

supposed to be indebted to the said Defendant \_\_\_\_\_, or to have effects of the said Defendant \_\_\_\_\_, in \_\_\_\_\_ possession, or under \_\_\_\_\_ control, and that \_\_\_\_\_ believe that process of Garnishment against the said \_\_\_\_\_

is necessary to obtain satisfaction of said claim; and that the said \_\_\_\_\_ is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose of vexing or harassing said Defendant \_\_\_\_\_, or other improper motives.

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

\_\_\_\_\_ Clerk Circuit Court.

116.

No. \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT

Plaintiff \_\_\_\_\_

Defendant \_\_\_\_\_

Bond and Affidavit in Garnishment on Summons

Filed this \_\_\_\_\_ day of \_\_\_\_\_

19 \_\_\_\_\_

Clerk \_\_\_\_\_

Baldwin Times Print.

*not  
summons  
see  
TO  
Sufficient  
other*