

SUMMONS and COMPLAINT

THE STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE
STATE OF ALABAMA:

NO. 13712

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

_____ TERM, 1950.

You Are Hereby Commanded to Summon IELAND M. TALIAFERRO and M. SELBY TALIAFERRO 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 IELAND M. TALIAFERRO and M. SELBY TALIAFERRO, Defendants, by the VILLA ROSE, INC., a corporation, Plaintiff.

Witness my hand this 19th day of June, 1950.

Arcif. Luck
Clerk

VILLA ROSE, INC.,
a corporation,

-vs-

IELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Plaintiff

Defendants

Plaintiff claims of the Defendants Six Hundred Thirty-eight Dollars and 44/100 Dollars (\$638.44) due by account made by them on to-wit, the Thirty-first day of December, 1949, with interest thereon. And Plaintiff says that the Defendants owe this sum of money together with interest on it and it is still due and unpaid.

RICKARBY & RICKARBY

By *E. G. Rickarby, Jr.*

E. G. Rickarby, Jr.
Attorneys for Plaintiff

The Account sued on is evidenced by an itemized, verified statement filed herewith.

RICKARBY & RICKARBY

By *E. G. Rickarby, Jr.*

E. G. Rickarby, Jr.
Attorneys for Plaintiff

Received in Sheriff's Office
this 12 day of June 1950
TAYLOR WILKINS, Sheriff

7 al. r. for

RECORDED

NO. 1576

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

TERM, 1950.

SUMMONS and COMPLAINT

VILLA ROSE, INC.,
a corporation,

Plaintiff

-VS-

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Defendants

Defendants live at

Summit Street
Fairhope, Alabama

and receive their mail at
P. O. Box 224, Fairhope.

RICKARBY & RICKARBY
Attorneys for Plaintiff

ALICE J. DUCK, Clerk

6-23-1950
of within Summons and

Leland M. Taliaferro
M. Selby Taliaferro

Taylor Wilkins Sheriff
Deputy Sheriff

VILLA ROSE, INC.,
a corporation,

Plaintiff.

-vs-

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Defendants

NO. _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

_____ TERM, 1950

INTEROGATORIES PROPOUNDED BY PLAINTIFF
TO DEFENDANT, IELAND M. TALIAFERRO:

Comes now the Plaintiff in the above styled cause and
propounds the following Interogatories to the Defendant, Ieland
M. Taliaferro, under Section 477 of Title 7 of the 1940 Code of
Alabama.

First: Is \$638.44 the correct balance on this account?

Second: Is it a fact that on the 26th day of May, 1950,
E. G. Rickarby, Jr., showed you a statement of
this account, showing a balance of \$638.44 on
this account, and you told him that it was the
correct balance due on this account, and that
you owed it and were going to pay it?

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary Public, personally ap-
peared E. G. Rickarby, Jr., who being first duly sworn, deposes and
says that he is the attorney for the Plaintiff in the above styled
cause and that the answers to the abovelisted questions will ma-
terially testify for the Plaintiff in this cause as well and truly
made.

E. G. Rickarby, Jr.
AFFIANT

Sworn to and subscribed
before me on this the
1950. day of June

Jefferson Bennett
Notary Public

6-23 1954
Serving copy of within Summons and
Complaint on

Taylor Wilkins Sheriff
H. F. Hall Deputy Sheriff

NO. 13-14
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
TERM, 1950

VILLA ROSE, INC.,
a corporation,
Plaintiff

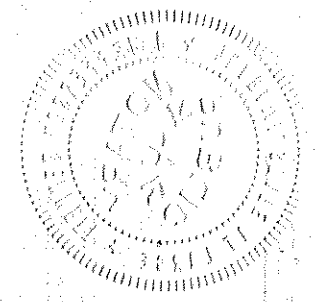
-vs-

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,
Defendants

INTEROGATORIES PROPOUNDED
BY PLAINTIFF TO DEFENDANT,
LELAND M. TALIAFERRO

FILED
JUN 19 1950
ALICE J. DUCK, Clerk

RICKARBY & RICKARBY
Attorneys for Plaintiff



16 June 1950

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

With this we are handing you Summons and Complaint, itemized and verified statement of account, and Interrogatories in the case of VillarRose, Inc. vs Ieland M. and M. Selby Taliaferro. Also, enclosed is our check for \$25.00 to cover costs of filing. Please issue process on this, and oblige.

Yours very truly

RICKARBY & RICKARBY

By 

EGR, Jr.:M

Enc.

825

CC: Villa Rose, Inc.
CC: Lissner & Rothman
Attorneys at Law
Chicago, Illinois

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

28 July 1950

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

1576-

Dear Mrs. Duck:

VILLA ROSE, INC. -vs- L. M. & S. M. TALIAFERRO:

Service was had in this case on the 23rd of June.
Please enter judgment by default for us if there
have been no pleadings filed. If there are some
pleadings filed, please advise, and oblige.

Yours very truly,

RICKARBY & RICKARBY

By

[Handwritten signature]

EGR, Jr.:M
825

Int 7 months

63840
4234
660.74

63840

3 1/2

31920
191520
22.34.40

STATE OF FLORIDA

COUNTY OF HIGHLANDS

Before me, the undersigned Notary Public, personally appeared ROSE CATALANO McQUADE, who, being first duly sworn, deposes and says that SHE is the DIRECTOR

of the VILLA ROSE, INC., a corporation, and as such has knowledge of the correctness of the account between said firm and IELAND M. TALIAFERRO and M. SELBY TALIAFERRO and that the attached itemized statement correctly shows such account and that the balance of Six Hundred Thirty-eight and 44/100 Dollars (\$638.44) shown thereon is still due after allowance of all proper credits and is unpaid.

Rose Catalano McQuade

Subscribed and sworn
to before me on this the
12th day of June, 1950

Murree Bartley
Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT, 31 1950.



Villa Rose DE SOTO CITY, FLORIDA
Rehabilitation Center for the Cerebral Palsied

Post Office Box 1387
Phone Sebring 5145
Director ROSE CATALANO
Cerebral Palsy Consultant
HARRIET E. GILLETTE, M. D.
Medical Consultant
STANLEY K. WALLACE, M. D.

June 9, 1950

Mr. and Mrs. Leland M. Taliaferro

In account with Villa Rose, a corporation for services and
care of George Taliaferro and Jimmie Taliaferro:

September incidentals	\$ 46.16
October tuition and laundry	360.00
October incidentals	20.26
November tuition and laundry	360.00
November incidentals	20.26
December tuition (17 days)	204.00
December incidentals	17.76

Total \$ 1028.44

Less credit reserve tuition 360.00

Total Balance due \$ 668.44

25 March 1950 Payment M. O.	25.00
14 March 1950 Payment M. O.	5.00

Present total Unpaid \$ 638.44

no. 1516

RECORDED

FILED

JUN 19 1950

ALICE J. DUCK, Clerk

VILLA ROSE, INC.,
a corporation,

Plaintiff

-vs-

IELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Defendants

FARMERS & MERCHANTS BANK,

Garnishee

NO. 1516

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NOTICE TO DEFENDANTS

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to notify IELAND M. TALIAFERRO
and M. SELBY TALIAFERRO, Defendants, that on the ^{22nd}
day of *Nov*, 1950, a writ of garnishment in the
above stated case was issued to FARMERS & MERCHANTS BANK, as
garnishee.

And you will return this writ according to law.

Witness my hand this ^{22nd} day of *Nov*, 1950.

Archie J. Smith
Clerk of the Circuit Court

7 Hope
Summit St.

Received in Sheriff's Office
this 22 day of Nov, 1950
TAYLOR WILKINS, Sheriff

No. 1516 1/2

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VILLA ROSE, INC.,
a corporation,
Plaintiff

-vs-

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,
Defendants

FARMERS & MERCHANTS BANK,
Garnishee

NOTICE TO DEFENDANTS

FILED

NOV 23 1950

ALICE J. DUCK, Clerk

RICKARBY & RICKARBY
Attorneys for Plaintiff

Executed 12-20-50
By Serving a Copy
on the with in names:

Taylor Wilkins Sh
By La Jackson Kh

VILLA ROSE, INC.
Plaintiff

VS.

LELAND M. TALLAFERRO, et al
Defendant

SECTION 101

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW. NO. 1516 $\frac{1}{2}$

Notice to Farmers and Merchants Bank of Foley, Alabama:

Comes the plaintiff by attorney, in the above styled cause and releases the garnishee Farmers and Merchants Bank of Foley, Alabama, because an agreement has been reached where the whole claim is to be paid off.

Witness my hand this 6th day of December, 1950.

Clerk, Circuit Court
Baldwin County, Alabama

12/12/50

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 15151

VILLA ROSE, INC.
Plaintiff
vs.
LEWIS M. TALLERRO, et al.
Defendant

Notice to Farmers and Merchants Bank of Foley, Alabama:
Comes the plaintiff by attorney, in the above styled cause and releases the
guarantee Farmers and Merchants Bank of Foley, Alabama, because an agreement has
been reached where the whole claim is to be paid off.
Witness my hand this 6th day of December, 1950.

Clerk, Circuit Court
Baldwin County, Alabama

15151/151

VILLA ROSE, INC.,
a corporation,

Plaintiff

-vs-

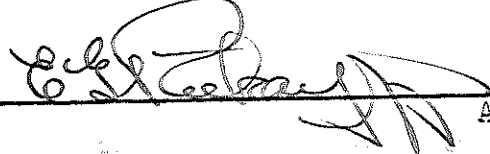
NO. 1516
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Defendants

AFFIDAVIT OF JUDGMENT

Personally appeared before me, E. G. RICKARBY, JR., Attorney for Plaintiff, who being duly sworn, on oath says, that in the Circuit Court of Baldwin County on to-wit the first day of August, 1950, VILLA ROSE, INC., a corporation, recovered a judgment against LELAND M. TALIAFERRO and M. SELBY TALIAFERRO for the sum of SIX HUNDRED SIXTY and 74/100 DOLLARS, besides TWELVE and 05/100 DOLLARS costs of suit; and that said judgment remains wholly unsatisfied and in full force and effect: that the FARMERS & MERCHANTS BANK of Foley, Alabama is supposed to be indebted to or have effects of the said LELAND M. TALIAFERRO and M. SELBY TALIAFERRO in their possession, or under their control, and that he believes process of Garnishment against said FARMERS & MERCHANTS BANK of Foley, Alabama, is necessary to obtain satisfaction of said judgment.


AFFIANT

Sworn to and subscribed before
me this 2 / day of November,

1950.


Notary Public, Baldwin County, Alabama

RECORDED
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA
NO. 1516 1/2

VILLA ROSE, INC.,
a corporation,
Plaintiff,

-vs-

LELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,
Defendants

AFFIDAVIT OF JUDGMENT

FILED
NOV 22 1950
ALICE J. DUCK, Clerk

RICKARBY & RICKARBY
Attorneys for Plaintiff

RECORDED
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
NO. 1516 1/2

RECORDED
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
NO. 1516 1/2

RECORDED
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
NO. 1516 1/2

VILLA ROSE, INC.,
a corporation,

Plaintiff

NO. 1516

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-vs-

IELAND M. TALIAFERRO and
M. SELBY TALIAFERRO,

Defendants.

WRIT ON JUDGMENT

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

Whereas E. G. RICKARBY, JR., has made affidavit as required by law that in the Circuit Court of Baldwin County VILLA ROSE, INC., a corporation, Plaintiff, recovered a judgment against IELAND M. TALIAFERRO and M. SELBY TALIAFERRO, Defendants, for the sum of SIX HUNDRED SIXTY and 74/100 DOLLARS, and the further sum of TWELVE and 05/100 DOLLARS cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that FARMERS & MERCHANTS BANK of Foley, Alabama, has, or is believed to have in their possession or under their control, money or effects belonging to the defendants, or to be liable to defendants on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said FARMERS & MERCHANTS BANK of Foley, Alabama, to be and appear within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making their answer if FARMERS & MERCHANTS BANK of Foley, Alabama has in their possession or under their control any money or effects belonging to the defendants; and whether FARMERS & MERCHANTS BANK of Foley, Alabama is indebted to said defendants; or is liable to the defendants on any contract for the payment of money or the delivery of personal property or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

Witness my hand this 22nd day of November, 1950.

Clifford A. Smith
Clerk of the Circuit Court

Received in Sheriff's Office
this 22 day of Nov, 1950
TAYLOR WILKINS, Sheriff

NO. 1516 ^{1/2}

VILLA ROSE, INC.,
a corporation,

-VS-

Defendants

FILED
JUN 22 1950

NOV 22 1950
ALICE J. DUCK, CL

Executed 25 Nov 19 50

by serving subpoena

OF *Farmers and Merchants Bank*
Italy, etc.

By W. A. Jackson Deputy Clerk

LAW OFFICES

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

ELLIOTT G. RICKARBY

E. G. RICKARBY, JR.

20 November 1950


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

Dear Mrs. Duck:

VILLA ROSE, INC. -vs- L. M. & M. S. TALIAFERRO:
NO. 1516:

With this we are handing you affidavit, writ and
notice of garnishment in subject case. Please see
that they are executed, and oblige.

Yours very truly,

for 
RICKARBY & RICKARBY

EGR, JR.:M
CC: Villa Rose, Inc.
825

ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

4 December 1950

Mrs. Alice J. Duck
Clerk of the Circuit Court
of Baldwin County
Bay Minette, Alabama


Dear Mrs. Duck:

NO. 1516½ - VILLA ROSE, INC. -vs- IELAND M. TALIA-
FERRO, et al:

In this case we have reached an agreement where the
whole claim is to be paid off, as follows: \$250.00
now and \$50.00 a month starting on 3 January 1951.

We request that you release the garnishee in this
case, and give us your bill for the costs.

Yours very truly,


for
RICKARBY & RICKARBY


EGR, JR.:M

CC: Mr. Forest C. Christian,
Attorney at Law
Foley, Alabama

CC: Farmers & Merchants National Bank
Foley, Alabama

CC: Villa Rose, Inc.
De Soto City, Florida

825

[illegible]

15/6