



BALDWIN TIRE STORE, a  
partnership, and  
HARRY STILL AND GEORGE BYRNE,

PLAINTIFFS

V.

CURTIS FOSTER,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN LAW NO. \_\_\_\_\_.

I

The plaintiffs claim of the defendant One hundred and eighty-nine dollars and thirty-one cents(\$189.31), due from him by account on the 24th day of November, 1952, which sum of money with interest thereon is still unpaid.

II

The plaintiffs claim of the defendant One hundred and eighty-nine dollars and thirty-one cents(\$189.31), due from him on account stated between the plaintiffs and the defendant on the 1st day of December, 1952, which sum of money with interest thereon is still unpaid.

III

The plaintiffs claim of the defendant One hundred and eighty-nine dollars and thirty-one cents(\$189.31), due from him for merchandise, goods and chattels sold by the plaintiffs to the defendant on the 22nd day of June, 1951, which sum of money with interest thereon is still unpaid.

J. Connor Owens, Jr.  
Attorney for Plaintiffs

This account is verified  
by affidavit attached hereto  
and made a part of this complaint.

J. Connor Owens, Jr.

--AFFIDAVIT--

STATE OF ALABAMA )  
 ) SS.  
BALDWIN COUNTY )

In the city of Bay Minette, Baldwin County, Alabama, came George Byrne and made oath and says that he is a partner in the Baldwin Tire Store, and is authorized to make this statement, and that he is familiar with the books and accounts of the Baldwin Tire Store, a partnership composed of George Byrne and Harry Still, and that Curtis Foster is justly and duly indebted to the said Baldwin Tire Store, and Harry Still and George Byrne in the sum of One hundred and eighty-nine dollars and thirty-one cents (\$189.31).

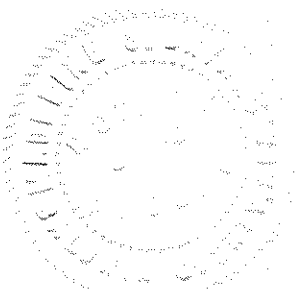
Now due and unpaid upon the account, the sum herein before last mentioned from Curtis Foster to the Baldwin Tire Store, a partnership, and Harry Still and George Byrne.

THE BALDWIN TIRE STORE

BY *George Byrne*  
*George Byrne*  
George Byrne

Subscribed and sworn to before me this 12 day of March, 1953.

*Madeline S. Brown*  
Notary Public



RECORDED ORIGINAL

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW NO. 1932

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BALDWIN TIRE STORE, a  
partnership, and  
HARRY STILL AND GEORGE BYRNE

PLAINTIFFS

V.

CURTIS FOSTER,

DEFENDANT

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SUMMONS AND COMPLAINT AND AFFIDAVIT

\*\*\*\*\*

FILED 3-12-53

Augusta  
CLERK

\*\*\*\*\*

J. CONNOR OWENS, JR.  
ATTORNEY  
BAY MINETTE, ALABAMA

Received in Sheriff's  
this 12 day of Mar, 19  
TAYLOR WILKINS, Sheriff

Executed May 11 1953  
by serving copy of within Summons and  
Complaint on

Curtis Foster

Taylor Wilkins Sheriff  
Robert Wilkins Deputy Sheriff

ATTACHMENT.

The State of Alabama, {  
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA: .

WHEREAS, the Baldwin Tire Store, a partnership composed of Harry  
Still and George Byrne, and Harry Still and George Byrne

Alice  
hath complained on oath to me, ~~ROBERT K. DUCK~~, Clerk of Circuit Court of Baldwin County, Ala.,  
that Curtis Foster

is justly indebted to the Plaintiffs the Baldwin Tire Store, a partnership com-  
posed of Harry Still and George Byrne, and Harry Still and George  
Byrne

in the sum of One hundred and eighty-nine and thirty-one (\$189.31) Dollars, and

the plaintiffs and Albert Thompson 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  
Curtis Foster

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., ~~within thirty days hereof,~~  
~~within thirty days hereof,~~

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

WITNESS. my hand, this 2<sup>nd</sup> day of March A. D. 1933

Alice J. Leach Clerk.

Received in Sheriff's Office  
this 2 day of Mar 1953  
TAYLOR WILKINS, Sheriff

No. 1932

## ATTACHMENT

Baldwin Tire Store, a  
partnership, and  
Harry Still  
George Byrne

Vs. { ATTACHMENT

Curtis Foster

Issued 3-2, 1953

MOORE PRINTING CO.,

1953 Black 2-ton  
Ford Truck  
on Anderson Road  
to John Sherry &  
turn to left

Executed May 11, 1953  
By serving a copy  
of the writ  
on Curtis Foster  
and by attaching  
one chm. car tag no  
9-20314 - two clon  
testam.

Taylor Wilkins  
Sheriff

By Robert Sullivan

9-20314

THE STATE OF ALABAMA )

BALDWIN COUNTY )

KNOW ALL MEN BY THESE PRESENTS, that we, George Byrne, Harry Still, Albert Thompson, are held and firmly bound unto Curtis Foster in the sum of \$378.62 to be paid to the defendant, his attorney, 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, administrators, jointly and severally, firmly by these presents,

Sealed with our seals and dated this 2nd day of March, 1953.

The condition of this obligation is such that, whereas, the Baldwin Tire Store, a partnership, composed of George Byrne and Harry Still, has the day of the date hereof, prayed an attachment against the estate of Curtis Foster, for the sum of \$18931, and has obtained same, returnable to the next term of the Circuit Court of Alabama, within thirty days hereof,

Now if the said Baldwin Tire Store should prosecute said attachment to effect, and pay the said Defendant all such damages as may be sustained by the Defendant by the wrongful or vexatious suing out of 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 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 written above.

George Byrne (LS)

Harry Still (LS)

Albert M. Thompson (LS)

\_\_\_\_ (LS)

Approved this 2nd day of March, 1953.

Marie J. French, Clerk

1932

RECORDED

In the Circuit Court of  
Baldwin County, Alabama

Baldwin Tire Store, a  
partnership,  
George Byrne  
Harry Still

V.

Curtis Foster

ATTACHMENT BOND

FILED

THE STATE OF ALABAMA

BALDWIN COUNTY

Before me, W C Beebe, personally appeared George Byrne, agent of the Baldwin Tire Store, and George Byrne and Harry Still, who being duly sworn, doth depose and say, that Curtis Foster, Bay Minette, Alabama, is justly indebted to the Baldwin Tire Store, a partnership composed of Harry Still and George Byrne, and to Harry Still and to George Byrne, in the sum of \$189.31, which said sum is justly due and that said Curtis Foster is about to remove his property out of the State so that the Baldwin Tire Store and Harry Still and George Byrne will probably loose his debt, or have to sue for it in another state, and that his attachment is not sued out for the purpose of vexing or harrassing the said Curtis Foster.

George Byrne Harry Still  
Sworn and subscribed to before me, this 2nd day of March, 1953.

W C Beebe  
Notary Public

My commission expires  
\_\_\_\_\_

1932.

RECORDED

In the Circuit Court of  
Baldwin County, Alabama

Baldwin Tire Store, a  
partnership, and  
Harry Still  
George Byrne

V.

Curtis Foster

ATTACHMENT AFFIDAVIT

FILED 3-2-53-

*Quincy J. Owens, Jr.*

J. Connor Owens, Jr.  
Attorney at Law  
Bay Minette, Alabama

