

2017

R. G. WALLACE,

PLAINTIFF

VS

VERNON W. VERANCE,

DEFENDANT.

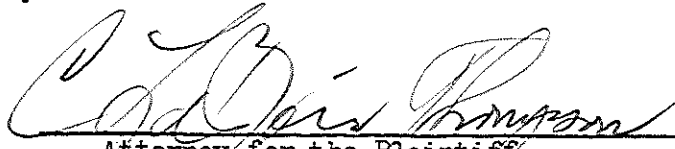
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant, a non-resident of Alabama, Two Hundred Seventy Eight & 16/100 (\$278.16) Dollars due by an account on, to-wit, May 30, 1953, with interest thereon.

The Plaintiff avers that said account for parts and labor furnished by the Plaintiff under contract with the Defendant for use on One 1946 Buick Automobile, Motor No. 4651369, property of the Defendant. Plaintiff claims mechanic lien on said automobile as provided for mechanics and material men by law, and Plaintiff further avers that on June , 1953, Plaintiff filed in Probate Office of Baldwin County, Alabama, a claim of said lien, copy of which is attached hereto as exhibit "A", and made a part hereof, and Plaintiff prays that said lien may be established and said automobile be condemned for the satisfaction of said indebtedness and same be ordered sold to satisfy said indebtedness.


Attorney for the Plaintiff.

Received in Sheet 115
this 13 day of June
TAYLOR WILKINS, Clerk

W 2017

R. H. Wallace

VS

Vernon W. Verance

FILED

JUN 13 1953

ALICE J. DUCK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for the State of Alabama, Baldwin County, personally appeared R. G. WALLACE, who is known to me and who being by me first duly sworn according to law on oath doth depose and say, that he is the Plaintiff in a certain cause being filed in the Circuit Court of Baldwin County, Alabama; and the Defendant in said cause, VERNON W. VERANCE, is a non-resident of the State of Alabama, and whose residence, after a search having been made with due diligence, is unknown according to the best information and belief of the Plaintiff and that your Plaintiff cannot ascertain after expending a reasonable effort, which has been made; that said Defendant is over the age of twenty-one years.

X R. G. Wallace
Plaintiff

Sworn to and subscribed before me
this 12 day of June, 1953.

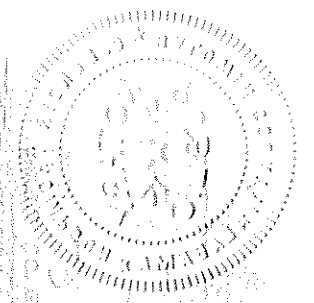
[Signature]
Notary Public.

100-100000

100-100000

100-100000

FILED
JUN 15 1952
ALICE J. DUCK, Clerk



THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, *C. L. Gray Thompson*in and for said County, personally appeared R. G. Wallacewho, being duly sworn, on oath saith that Vernon W. Verance, a non resident of Alabama

is

justly indebted to

R. G. Wallacein the sum of Two Hundred Seventy Eight & 16/100 Dollars,

which said amount is justly due after allowing all just offsets and discounts, and that the said

Vernon W. Verance gave his permanent address as 1325 Lendon Avenue, Baltimore,Maryland, and that a registered letter sent to Vernon W. Verance at saidaddress was returned unclaimed

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 13 day of June, 1953

R. G. Wallace
C. L. Gray Thompson
 Notary Public

No. ----- Page -----

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

At Bay Minette, Ala.

TO

ATTACHMENT BOND AND AFFIDAVIT

Filed this the ----- day

of -----, 1953

Clerk

Attorney

FILED
JUN 11 1953
CLERK

THE STATE OF ALABAMA }
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We,

, of the County of Baldwin

are held and firmly bound unto

in the sum of _____ Dollars, to

be paid to the said

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 _____, 194_____

The Condition of this Obligation is such:

That whereas, the above bounden

ha_____, on the day of the date

hereof, prayed an Attachment at the suit of _____

against the estate of above named

for the sum of _____ Dollars,

and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said _____

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.

_____(Seal)

_____(Seal)

_____(Seal)

_____(Seal)

Approved, this _____ day of _____, 194_____

_____, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Vernon W. Verance, 1325 Lendon Avenue,
Baltimore, Maryland

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 _____

Vernon W. Verance, Defendant_____

by _____

R. G. Wallace, Plaintiff_____

Witness my hand this 13th day of June 1953

Bessie J. Verance, Clerk

No. _____ Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

_____, 19 _____

_____, Sheriff

I have executed this summons

this _____, 19 _____
by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

R. G. WALLACE,

PLAINTIFF

VS

VERNON W. VERANCE,

DEFENDANT.

IN THE CIRCUIT COURT OF

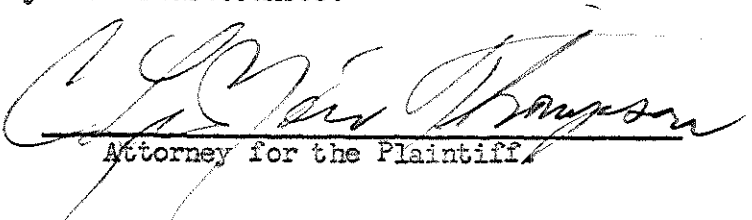
BALDWIN COUNTY, ALABAMA

AT LAW

48
9
0
1
2

The Plaintiff claims of the Defendant, a non-resident of Alabama, Two Hundred Seventy Eight & 16/100 (\$278.16) Dollars due by an account on, to-wit, May 30, 1953, with interest thereon.

The Plaintiff avers that said account for parts and labor furnished by the Plaintiff under contract with the Defendant for use on One 1946 Buick Automobile, Motor No. 4651369, property of the Defendant. Plaintiff claims mechanic lien on said automobile as provided for mechanics and material men by law, and Plaintiff further avers that on June , 1953, Plaintiff filed in Probate Office of Baldwin County, Alabama, a claim of said lien, copy of which is attached hereto as exhibit "A", and made a part hereof, and Plaintiff prays that said lien may be established and said automobile be condemned for the satisfaction of said indebtedness and same be ordered sold to satisfy said indebtedness.


Attorney for the Plaintiff

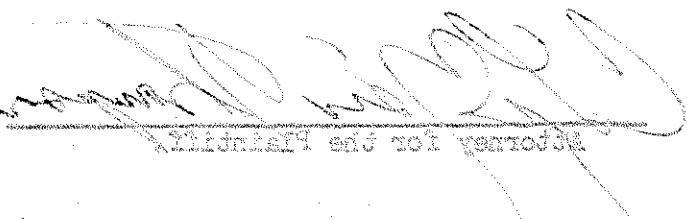
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

R. C. WALLACE,
PLAINTIFF
VS
VERNON W. VERANCE,
DEFENDANT.

The Plaintiff claims of the Defendant, a non-resident of Alabama,
Two Hundred Seventy Eight & 16/100 (\$278.16) Dollars due by an account
on, to-wit: May 30, 1953, with interest thereon.

The Plaintiff avers that said account for parts and labor furnished
by the Plaintiff under contract with the Defendant for use on one 1949
Buick Automobile, Motor No. 1651369, property of the Defendant. Plaintiff
claims mechanic lien on said automobile as provided for mechanics and
material men by law, and Plaintiff further avers that on June 1, 1953,

Plaintiff filed in Probate Office of Baldwin County, Alabama, a claim of
said lien, copy of which is attached hereto as exhibit "A", and made a
part thereof, and Plaintiff prays that said lien may be established and
said automobile be condemned for the satisfaction of said indebtedness
and same be ordered sold to satisfy said indebtedness.


Attorney for the Plaintiff

ALICE J. BUCK, Clerk

JUN 13 1953

1107000

STATE OF ALABAMA

BALDWIN COUNTY

R. G. Wallace files this statement in writing, verified by the oath of R. G. Wallace, who has personal knowledge of the facts herein set forth:

That said R. G. Wallace claims a lien upon the following property situate in the garage of R. G. Wallace in Loxley, Baldwin County, Alabama, to-wit:

1946 Buick, 4 door Sedan, Motor Number 4651369

That said lien is claimed to secure an indebtedness of \$278.16 with interest from, to-wit, May 30, 1953, for R. G. Wallace.

The name of owner or proprietor of said property is Vernon W. Verance, a non-resident of Alabama.

R. G. Wallace

Affiant..

Before me, C. Lynn Thompson, a Notary Public in and for the County of Baldwin, State of Alabama, personally appeared R. G. Wallace, who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien, and that the same are true and correct to the best of his knowledge and belief.

R. G. Wallace

Affiant

Sworn to and subscribed before me this the 13 day of June, 1953, by said affiant.

C. Lynn Thompson





[Handwritten signature]

Subscribed and sworn to and authenticated before me this 15 day of June, 1953.

and are true and correct to the best of his knowledge and belief.

At this time and place in the foregoing statement of him, and that the

who being duly sworn, both depose and say: That he has personal knowledge

County of Baldwin, State of Alabama, personally acquainted H. G. Wallace;

Before me, *[Handwritten signature]* a Notary Public in and for the

Alabama.

[Handwritten signature]

FILED
JUN 15 1953
Alice J. Duck, Clerk

a non-resident of Alabama.

The name of owner or proprietor of said property is Herman H. Kerens
inferred from Ex-117, Vol. 30, 1953, for H. G. Wallace.

That said lien is claimed to secure an indebtedness of \$250.00 with

John Baker, a debt bearing interest number 19531000

County:

situate in the County of H. G. Wallace in Tooley, Baldwin County, Alabama;

That said H. G. Wallace claims a lien upon the following property:

of H. G. Wallace, who has personal knowledge of the facts herein set forth:

H. G. Wallace lives in the statement in writing, verified in the copy

WITNESS MY HAND

NOTARY OF ALABAMA

BALDWIN COUNTY

That said R. G. Wallace claims a lien upon the following property
situate in the garage of R. G. Wallace in Loxley, Baldwin County, Alabama,
to-wit:

That said lien is claimed to secure an indebtedness of \$278.16 with interest from, to-wit, May 30, 1953, for R. G. Wallace.

The name of owner or proprietor of said property is Vernon W. Verance,
a non-resident of Alabama.

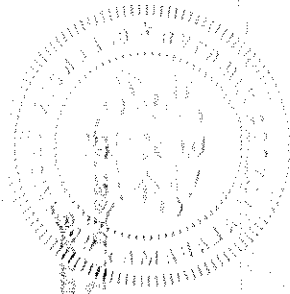
Affiant.

Before me, Clifford W. Rogers a Notary Public in and for the
County of Baldwin, State of Alabama, personally appeared R. G. Wallace,
who being duly sworn, doth depose and say: That he has personal knowledge
of the facts set forth in the foregoing statement of lien, and that the
same are true and correct to the best of his knowledge and belief.

Affiant

Sworn to and subscribed before me this the 13 day of June, 1953,
by said affiant.

C. B. Thompson



Subscribed and sworn to and attested before me this 30 day of June, 1953.

[Signature]

same are true and correct to the best of his knowledge and belief.

[Signature]

of the facts set forth in the foregoing statement of fact and give the who being duly sworn, depose and say: That he has personal knowledge

County of Baldwin, State of Alabama, personally observed W. C. Wallace,

before me:

[Signature] Notary Public for the State of Alabama

[Signature]

Witness.

A Non-Resident of Alabama.

The name of owner or proprietor of said property is Vernon W. Adams, inferred from source, May 30, 1953, for W. C. Wallace.

That said man is claimed to receive an independence of \$218.75 per

month from the Motor Number 102130

power:

Witness to the facts of W. C. Wallace in Jones, Baldwin County, Alabama, *W.C.*

That said W. C. Wallace claims a lien upon the following property

of W. C. Wallace, and has personal knowledge of the same being and being:

W. C. Wallace lives this statement in writing, verified by the oath

within County

State of Alabama

FILED
JUN 15 - 1953
ALICE J. BUCK, Clerk

2017

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Vernon W. Verance, 1325 Lendon Avenue,
Baltimore, Maryland

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 _____

Vernon W. Verance, Defendant

by _____

R. G. Wallace, Plaintiff

Witness my hand this 13th day of June 1951

David L. Busch, Clerk

No. _____ Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

_____, 19 _____

_____, Sheriff

I have executed this summons

this _____, 19 _____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff