

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON
EBERHARD E. BALL

TELEPHONE 937-2191

January 15, 1970

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama 36507

8985

Dear Mrs. Duck:

Re: Fred A. Holk, Sr. vs. Frank
Tew

In the above case we had an attachment issue during the month of November, 1969 which was never served on the defendant.

Would you please reissue the attachment on receipt of this letter and notify us that you have done so.

We will instruct the sheriff as to how this attachment can be served as soon as we have heard from you with respect to the same.

Thanking you for your attention to this request,
we are

Sincerely,

CHASON, STONE & CHASON

By: 

NCS:dr

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO.

PLEA

COUNT ONE

Comes the Defendant and for answer to the Plaintiff's
Count One pleads the general issue.

COUNT TWO

Comes the Defendant and for answer to the Plaintiff's
Count Two pleads the general issue.

Daniel E. Robison
Daniel E. Robison
Attorney for Defendant

I hereby certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceedings, by mailing the same by First Class Mail, properly addressed, on the 31st day of January, 1970.

Daniel C. Robinson.

FILED

FEB 2 1970

ALICE J. DUCK CLERK
REGISTER

Handwritten notes at the top of the page, including a date and some illegible text.

Handwritten notes in the middle section of the page, continuing the text from the top.

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Handwritten notes in the bottom section of the page.

8985-

THE STATE OF ALABAMA,
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Norborne C. Stone, Jr.

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that
Frank Tew

is justly indebted to the Plaintiff Fred A. Holk, Sr., also known as Ted Holk, Sr.

in the sum of Five Hundred fifty-two and 12/100ths Dollars, and
Norborne C. Stone, Jr. 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
Frank Tew

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 futher proceedings thereon to be
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said
County, on the first Monday of December 1969
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 12 day of November A. D., 1969.

Alice J. Duck Clerk.

Received 16th Jan. 1970 day of Jan 1970
and on 17th Jan day of Jan 1970
I served a copy of the within Attachment
on Frank Jew

By service on

TAYLOR WILKINS

July 72

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Druid
DEPUTY SHERIFF

14

James E. Druid
Deputy Sheriff

318475 313408
5-21-809

No. 8985

ATTACHMENT

Fred A. Holt, Jr.
a/k/a.
Vs. { ATTACHMENT
Frank Jew

Issued 11-12, 1969

Moore Printing Co.,

Executed January 19, 1970 by
attaching one 1963 tudor Chevrolet
Serial #31847S313408, Tag #5-21869
and stored same at the Baldwin County
Jail.

Storage 1.00

FRED A. HOLK, SR.,
individually and doing
business as ARTHUR HOLK
& SON,

Plaintiff,

vs.

FRANK TEW,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

COUNT ONE

The Plaintiff claims of the Defendant the sum of Four Hundred Ninety-seven and 75/100ths Dollars (\$497.75) for money loaned by the Plaintiff to the Defendant on, to-wit, the first day of October, 1969, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Four Hundred Ninety-seven and 75/100ths Dollars (\$497.75) for money paid by the Plaintiff for the Defendant on, to-wit, the first day of October, 1969, at his request, which sum of money with the interest thereon is still unpaid.

CHASON, STONE & CHASON

By:

John Earle Chason
Attorneys for Plaintiff

FILED

JAN 26 1970

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 27 day

of January, 1970

John Earle Chason
VOL

ALICE J. DUCK

CLERK
REGISTER

67 PAGE 691

8985 -

FRED A. HOLK, SR., individually and
doing business as ARTHUR HOLK & SON,

Plaintiff,

vs.

FRANK TEW,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. _____

* * * * *

COMPLAINT

* * * * *

FILED

JAN 26 1970

ALICE J. BOYD CLERK
RECLER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

Before me, Alice J. Duck, Clerk of the Circuit Court

in and for said County, personally appeared Norborne C. Stone, Jr.

who, being duly sworn, on oath saith that Frank Tew

..... justly indebted to

Fred A. Holk, Sr., also known as Ted Holk, Sr.

in the sum of Five Hundred fifty-two and 12/100ths Dollars,

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

Tew is a non-resident of the State of Alabama

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 12 day of November, 1969

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STATE OF ALABAMA
Baldwin County

CIRCUIT COURT
At Bay Minette, Ala.

0.1

ATTACHMENT BOND AND AFFIDAVIT

Filed this the _____ day

of 1911

_____, Clerk

Attorney

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 our-
 selves 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 _____, 19 ____

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 _____, 19 ____

_____, Clerk