

FARMERS AND MERCHANTS BANK, )  
a State Banking Corporation, )

Plaintiff, )

vs. )

CHARLES HAYNES and )  
CATHERINE C. HAYNES, )

Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
LAW SIDE

CASE NO. 9115

The Plaintiff claims of the Defendants Four Hundred Forty-one and 93/100 Dollars (\$441.93) damages for that on the 21<sup>st</sup> day of January, 1970, for the purpose of inducing the Plaintiff to honor checks made or uttered by the Defendants on the Plaintiff bank, the Defendants did deposit a check drawn on Cook Banking Company, Cockran, Georgia, in the amount of One Thousand, One Hundred Dollars (\$1,100.00), at which bank the Defendants had no account. The Plaintiff was thereby induced to furnish funds from said bank on said check and withdrawals of the Defendants in the amount of Four Hundred Forty-one and 93/100 Dollars (\$441.93) as aforesaid. The said Defendants knew or should have known that the said check on the Cook Banking Company of Cockran, Georgia, in the amount of One Thousand, One Hundred Dollars (\$1,100.00) would not be honored or paid as they had no account therein.

  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9115

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon .....

Charles Haynes & Catherine C. Haynes

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.....

Charles Haynes & Catherine C. Haynes Defendant.....

by Farmers & Merchants Bank of Foley

..... Plaintiff.....

Witness my hand this 9 day of Feb 1910

Alvin J. Webb Clerk

E42-9-70

## STATE OF ALABAMA

Baldwin County

## CIRCUIT COURT

Farmers Merchants

Bank

Plaintiffs

vs.

Charles Haynes  
Catherine C. Haynes

Defendants

## SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

C. G. Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Feb. 9, 1910

Sheriff

I have executed this summons

this Feb. 9, 1910

by leaving a copy with

Charles Haynes

Catherine Haynes

Sheriff

Deputy Sheriff

No

in m

9115  
STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA

Whereas E. F. Sanders as President and agent for the Farmers and Merchants Bank, Foley, Alabama, a State banking corporation, hath complained to me, O. L. Bodenhamer, a Justice of the Peace, Baldwin County, State of Alabama, that Charles Haynes and Catherine C. Haynes are justly indebted to the said Farmers and Merchants Bank in the sum of Four Hundred Forty-one and 93/100 Dollars (\$441.93), and the plaintiff having made affidavit as prescribed by law and not being required in this instance to make bond, you are hereby commanded to attach so much of the estate of Charles Haynes and Catherine C. Haynes as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure the same may be liable to further proceedings thereon, to be had in the Circuit Court for the County of Baldwin to be held at the Courthouse thereof; when and where you must make known how you have executed this writ.

Witness my hand and seal on this the 7th day of February, 1970.



O. L. BODENHAMER  
Justice of the Peace  
Beat 14  
Foley, Alabama

FILED

1970

ALICE J. DUCK CLERK  
REGISTER

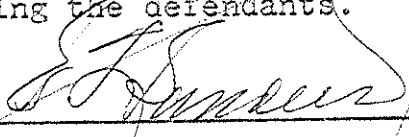
STATE OF ALABAMA

BALDWIN COUNTY

ATTACHMENT AFFIDAVIT

Before me, the undersigned authority, in and for said State and County, personally appeared E. F. Sanders, who being by me first duly sworn, on oath deposes and says:

That he is President of the Farmers and Merchants Bank, Foley, Alabama; that Charles Haynes and Catherine C. Haynes who are known to your affiant as husband and wife, are justly indebted to said Farmers and Merchants Bank, Foley, Alabama, a State banking corporation, in the sum of Four Hundred Forty-one and 93/100 Dollars (\$441.93), and that said amount is justly due and that the defendants reside out of the State or are about to abscond, and that the said Farmers and Merchants Bank will probably lose its debt; that the attachment is not sued out for the purpose of vexing or harassing the defendants.



Sworn to and subscribed before me this the 7th day of February, 1970.



Notary Public, Baldwin County  
State of Alabama



(C. G. CHASON)  
Notary Public  
Baldwin County, Alabama  
My Commission Expires 7 May, 1970.  
My Commission Expires:

STATE OF ALABAMA

BALDWIN COUNTY

4115

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA

Whereas E. F. Sanders as President and agent for the Farmers and Merchants Bank, Foley, Alabama, a State banking corporation, hath complained to me, O. L. Bodenhamer, a Justice of the Peace, Baldwin County, State of Alabama, that Charles Haynes and Catherine C. Haynes are justly indebted to the said Farmers and Merchants Bank in the sum of Four Hundred Forty-one and 93/100 Dollars (\$441.93), and the plaintiff having made affidavit as prescribed by law and not being required in this instance to make bond, you are hereby commanded to attach so much of the estate of Charles Haynes and Catherine C. Haynes as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied, so to secure the same may be liable to further proceedings thereon, to be had in the Circuit Court for the County of Baldwin to be held at the Courthouse thereof; when and where you must make known how you have executed this writ.

Witness my hand and seal on this the 7th day of February, 1970.

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O. L. BODENHAMER  
Justice of the Peace  
Beat 14  
Foley, Alabama

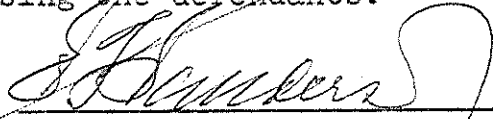
STATE OF ALABAMA

BALDWIN COUNTY

ATTACHMENT AFFIDAVIT

Before me, the undersigned authority, in and for said State and County, personally appeared E. F. Sanders, who being by me first duly sworn, on oath deposes and says:

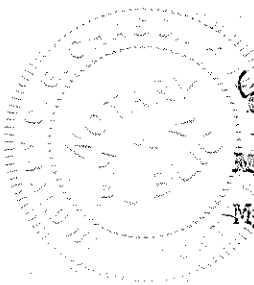
That he is President of the Farmers and Merchants Bank, Foley, Alabama; that Charles Haynes and Catherine C. Haynes who are known to your affiant as husband and wife, are justly indebted to said Farmers and Merchants Bank, Foley, Alabama, a State banking corporation, in the sum of Four Hundred Forty-one and 93/100 Dollars (\$441.93), and that said amount is justly due and that the defendants reside out of the State or are about to abscond, and that the said Farmers and Merchants Bank will probably lose its debt; that the attachment is not sued out for the purpose of vexing or harassing the defendants.



Sworn to and subscribed before me this the 7th day of February, 1970.



Notary Public, Baldwin County  
State of Alabama



(Affix Seal)  
G. G. CHASON, Notary Public  
Baldwin County, Alabama  
My Commission Expires 2 May, 1970.  
My Commission Expires:

THE STATE OF ALABAMA, {  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, E. F. Sanders

O. L. Bodenhamer, Justice of Peace Beat 14,  
hath complained on oath to me, ~~Alfred J. Black, Clerk of Circuit Court~~ of Baldwin County, Ala., that

Charles Haynes & Catherine C. Haynes

is justly indebted to the Plaintiff Farmers & Merchants Bank

in the sum of Four Hundred Forty-one and 93/100 - - - Dollars, and

~~exhibits~~ E. F. Sanders having made affidavit and <sup>no</sup>~~given~~ bond  
Non-resident of Alabama,  
~~xxx~~required by law/in such cases, you are hereby commanded to attach so much of the estate of  
Charles Haynes & Catherine C. Haynes

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., at a term thereof, to be held at the Court House of said  
County, on within 30 days from the service hereof, Monday of 19  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 9th day of February A. D., 1970.

Alfred J. Black Clerk.



No. 9115

# ATTACHMENT

FARMERS & MERCHANTS BANK

Vs. { ATTACHMENT

CHARLES HAYNES & CATHERINE C. HAYNES

Issued \_\_\_\_\_, 19\_\_

Moore Printing Co.

Executed 2/9/70 by attaching the following property: K 1 Yellow Electric Cable (50 ft.), 1 Ohometer (Robinson); 1 Pipe Wrench (with threaders); 1 pipe Reamer; 1 Pipe Threader; 1 1/4 in. Stillson Wrench; 1 Tube Cutter; 1 Claw Hammer; 1 Lot of End-Wrenches; 2 Crescent Wrenches--1-10-1-12 in.; 1 Box Plumbers Tools; 1 306 Mitchell Reel & Rod; 1 304 Mitchell Reel & Rod; 1 350 Penn Reel and Rod; 1 H. I. Surf Rod & Reel; 1 Power Master BB Gun; 1 Daisy Air Rifle; 1 Chevy 2 dr. SS 396, 1968, Serial No. 138378 A 138332.

*Noted by Charles Robinson FIS  
Notice of levy was received on September 4*

no. 9115

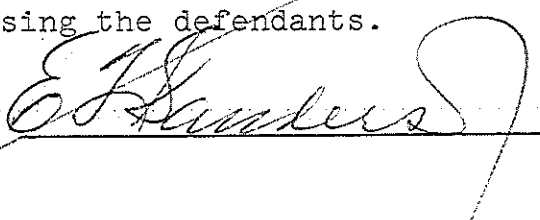
STATE OF ALABAMA

BALDWIN COUNTY

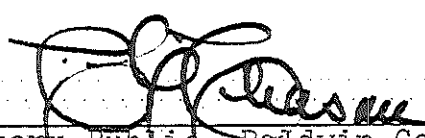
ATTACHMENT AFFIDAVIT

Before me, the undersigned authority, in and for said State and County, personally appeared E. F. Sanders, who being by me first duly sworn, on oath deposes and says:

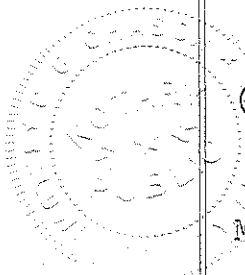
That he is President of the Farmers and Merchants Bank, Foley, Alabama; that Charles Haynes and Catherine C. Haynes who are known to your affiant as husband and wife, are justly indebted to said Farmers and Merchants Bank, Foley, Alabama, a State banking corporation, in the sum of Four Hundred Forty-one and 93/100 Dollars (\$441.93), and that said amount is justly due and that the defendants reside out of the State or are about to abscond, and that the said Farmers and Merchants Bank will probably lose its debt; that the attachment is not sued out for the purpose of vexing or harassing the defendants.



Sworn to and subscribed before me this the 7th day of February, 1970.



Notary Public, Baldwin County  
State of Alabama



(Affix Seal)  
G. G. CHASON, Notary Public  
Baldwin County, Alabama  
My Commission Expires May, 1970.  
My Commission Expires:

FILED

FEB 11 1970

ALICE J. DUCK CLERK  
REGISTER

FARMERS AND MERCHANTS BANK, )  
a State Banking Corporation, )  
Plaintiff, )

vs. )

CHARLES HAYNES and )  
CATHERINE C. HAYNES, )  
Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
LAW SIDE

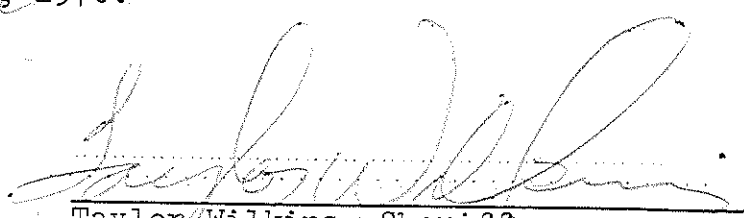
CASE NO. \_\_\_\_\_

TO CHARLES HAYNES AND CATHERINE C. HAYNES

You are hereby notified that Writ of Attachment issued by  
O. L. Bodenhamer, Justice of the Peace, Beat 14, Baldwin County,  
Alabama, in favor of the Farmers and Merchants Bank, a State  
banking corporation, and against Charles Haynes and Catherine C.  
Haynes for the sum of Four Hundred Forty-one and 93/100 Dollars  
(\$441.93) returnable to the Circuit Court to be held for the  
County of Baldwin, State of Alabama, placed in my hands for  
execution, has been executed by me by levying the same upon the  
following property, levied upon as the property of Charles Haynes  
and/or Catherine C. Haynes, to-wit:

Executed 2/9/70 by attaching the following property: 1 Yellow  
Electric Cable (50 ft.), 1 Ohometer (Robinson); 1 Pipe Wrench (with threaders);  
1 pipe Reamer; 1 Pipe Threader; 1 14 in. Stillson Wrench; 1 Tube Cutter; 1 Claw  
Hammer; 1 Lot of End-Wrenches; 2 Crescent Wrenches--1-10-1-12 in.; 1 Box Plumbers  
Tools; 1 306 Mitchell Reel & Rod; 1 304 Mitchell Reel & Rod; 1 350 Penn Reel and  
Rod; 1 H. I. Surf Rod & Reel; 1 Power Master BB Gun; 1 Daisy Air Rifle; 1 Chevy  
2 dr. SS 396 , 1968, Serial No. 138378 A 130332; ~~1968 Chevrolet~~

Issued February 7th, 1970.

  
Taylor Wilkins, Sheriff  
Baldwin County, Alabama

Expected Dec. 9, 14 18  
By sewing the witness  
Copy on,  
Charles Harper  
Catherine Harper  
And storing at Baldwin  
Co. Jan -  
Deputy Jackson Shoff  
Paul Kline