

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S).  
REQUIRED FEE(S) PAID.



Show to whom, date and address  
where delivered



Deliver ONLY  
to addressee

### RECEIPT

Received the numbered article described below.

REGISTERED NO.

SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)

CERTIFIED NO.

445379

1

2

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

INSURED NO.

DATE DELIVERED

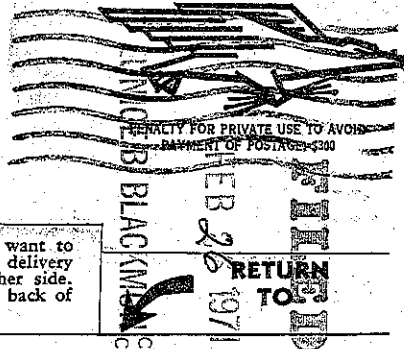
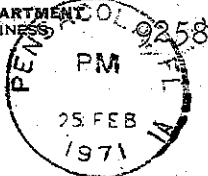
2-25-71

SHOW WHERE DELIVERED (only if requested)

3

3531 Freestone Blvd  
Tombola Fla 32563

POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS



POSTMARK OF DELIVERING OFFICE

Print your name and address below. If you want to restrict delivery, or to have the address of delivery shown on this receipt, check block(s) on other side. Moisten gummed ends and attach this card to back of article.

Mrs. Eunice B. Blackmon, Circuit Clerk  
P. O. Box 239  
Bay Minette, Alabama

POD Form 3811 Apr. 1969 c85-16-71548-11

FAIRHOPE TITLE & SURVEY COMPANY, )  
INC., )

Plaintiff, )

vs. )

FRED PIERCE and K. P. PIERCE, )

Defendants. )

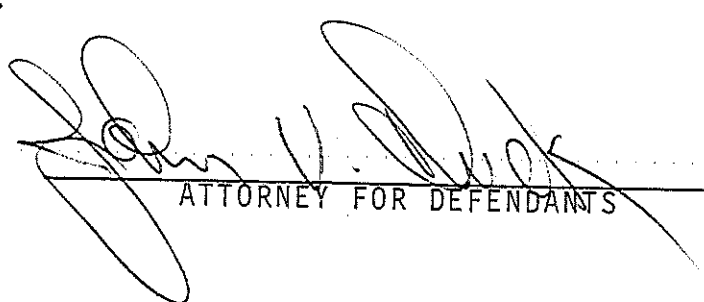
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 9258

Comes now the Defendants in the above styled cause, and for answer to the Bill of Complaint heretofore filed, says:

1. "Not guilty".

  
ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 26 day of February, 1971

  
Attorney for Defendants

**FILED**

MAR 1 1971

EUNICE B. BLACKMON CIRCUIT CLERK

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO

Mrs. Eunice Blackmon

Bay Minette, Ala.

DATE

DATE

February 26, 1971

Re: Fairhope Title & Survey vs. Pierce

Civil Case No. 9258

Dear Mrs. Blackmon:

Enclosed please find Answer to be filed  
in captioned cause.

Sincerely,

*John V. Duck*  
(H)

SIGNED

SIGNED

Our File No. 62-353

Your File No. ....

Law Offices

E. G. RICKARBY  
35 SOUTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

Code 205  
Telephone: 928-9836

Mailing Address  
P.O. Box 471

July 3, 1970

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

Dear Mrs. Duck:

Inre: Fairhope Title & Survey Co., Inc.  
vs. Fred Pierce & K. P. Pierce  
Case No. 9258

Enclosed find Bond, Affidavit and designation of property  
for an attachment.

In this case I filed suit against the two Pierce brothers  
but one of them came in and paid half the case. I am dis-  
missing as to him but trying to get service on the other  
one who is living over in Pensacola.

Hope everything is clear.

Yours very truly,



EGR/jc  
Encls.  
7-13-70

LAW OFFICES  
**RICKARBY & BENTON**

ATTORNEYS AT LAW  
35 SOUTH SECTION STREET  
P. O. BOX 471  
FAIRHOPE, ALABAMA 36532

E. G. RICKARBY  
DANIEL A. BENTON

TELEPHONE  
(205) 928-2308

February 12, 1971

Mrs. Eunice Blackmon  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

Inre: Fairhope Title & Survey Co., Inc.  
vs. Fred Pierce and K. P. Pierce  
Case No. 9258      File #89-353

Enclosed find Notice of Attachment and Affidavit  
for Service by Registered Mail. Please check your file  
to see if this has been done. If not, go ahead with it.

I am sending you check for \$25.00 deposit for  
costs. If we do not get service by Registered Mail, let  
me know just as soon as you receive the return and I will  
write up the publication on it.

Yours very truly,

  
E. G. RICKARBY  
Attorney at Law

EGR/jc  
Encl.  
cc: Fairhope Title & Survey Company  
2-26-71

FAIRHOPE TITLE & SURVEY  
COMPANY, INC.,

Plaintiff,

VS.

FRED PIERCE AND K. P. PIERCE,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

CASE NO.

9258

NOTICE OF ATTACHMENT BY PUBLICATION

Whereas, the Plaintiff, FAIRHOPE TITLE & SURVEY COMPANY, INC., in the above styled cause sued out in said Court, a Writ of Attachment against the estate of K. P. PIERCE; and Whereas, said Writ of Attachment was executed by the Sheriff of Baldwin County, Alabama, on, to-wit, the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by levying upon the following described property of the Defendant, to-wit:

The Eastern Three-fourths (3/4) of the Southwest Quarter of the Northeast Quarter of Section 11, Township 7 South, Range 2 East, Baldwin County, Alabama, containing Thirty (30) acres, more or less.

And Whereas, the Defendant is a non-resident of the State of Alabama, and the place of residence and post office address of said Defendant is P. O. Box 3531 Firestone Drive, Pensacola, Florida.

NOW THEREFORE, the Defendant, K. P. PIERCE, is hereby notified of the issuance of attachment execution thereof and to be and appear, if he thinks proper, to defend said suit at the present term of the Circuit Court and within thirty (30) days after this notice by publication is completed.

WITNESS my hand this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

CIRCUIT CLERK

LAW OFFICES  
RICKARBY & BENTON

ATTORNEYS AT LAW  
35 SOUTH SECTION STREET  
P. O. BOX 471  
FAIRHOPE, ALABAMA 36532

E. G. RICKARBY  
DANIEL A. BENTON

TELEPHONE  
(205) 928-2308

March 22, 1971

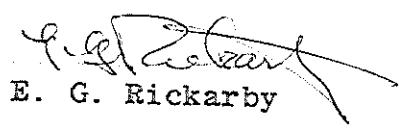
Mrs. Eunice Blackmon  
Clerk of the Circuit Court  
Bay Minette, Alabama

Re: Fairhope Title & Survey  
v. Fred Pierce, et al.  
Case No. 9258  
Our File No. 69-353

Dear Mrs. Blackmon:

You will remember we made an attachment to get service in this case on Mr. K. P. Pierce. On the 26th of February, Mr. Duck filed an appearance for Mr. K. P. Pierce, so I request that you send a copy of this letter, requesting that the attachment be dismissed at the request of the plaintiff's attorney, to Mr. Wilkins so that we will not incur any unnecessary expenses.

Yours very truly,

  
E. G. Rickarby

EGR:w  
cc-Mr. John V. Duck  
-Mr. Taylor Wilkins

FAIRHOPE TITLE & SURVEY COMPANY, INC. X

Plaintiff,

X

IN THE CIRCUIT COURT OF

VERSUS

X

BALDWIN COUNTY, ALABAMA

FRED. PIERCE & K. P. PIERCE,

X

AT LAW.

Defendant.

X

CASE NO. 9258

OATH FOR ATTACHMENT

Before me, the undersigned Notary Public, personally appeared CLAUDE W. ARNOLD, who being first duly sworn, deposes and says that the Defendant, K. P. PIERCE, is justly indebted to the Plaintiff in the sum of ONE HUNDRED FIFTY-NINE (<sup>125.00</sup>\$159.00) DOLLARS, which sum is justly due and that the Defendant, K. P. PIERCE, resides out of the State of Alabama and that the Attachment is not sued out for the purpose of vexing and harrassing the Defendant. Plaintiff elects not to give bond.

Claude W. Arnold  
AFFIANT

Subscribed and Sworn to before me this the

21 day of Dec, 1970.

E. L. Jackson  
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA,

COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, personally appeared CLAUDE W. ARNOLD, who being first duly sworn, deposes and says that the Defendant in this case is a non-resident of the State of Alabama and that his residence is known and that his Post Office residence is P. O. Box 3531 Firestone Drive, Pensacola, Florida;

Wherefore, Plaintiff prays that service be had upon the Defendant, K. P. PIERCE, by Registered Mail.

Claude W. Arnold  
Affiant

Subscribed and Sworn to before me this the

day of 11 Dec, 1970.

E. L. Jackson  
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon FRED PIERCE and K. P. PIERCE 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 FRED PIERCE and K. P. PIERCE, Defendants, by FAIRHOPE TITLE & SURVEY COMPANY, INC., Plaintiff.

WITNESS my hand this 18 day of May, 1970.

Alfred J. Duck  
Clerk.

FAIRHOPE TITLE & SURVEY COMPANY,  
INC.,

Plaintiff,

VERSUS

FRED PIERCE and K. P. PIERCE,

Defendants.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

9258

C O M P L A I N T

Count I.

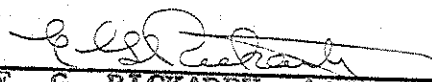
The Plaintiff claims of the Defendants THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them by account, on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendants the sum of THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them by account stated between the Plaintiff and the Defendants on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendants the sum of THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them for professional engineering services rendered by the Plaintiff to the Defendant, on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid.

  
E. G. RICKARBY, Attorney for  
Plaintiff.

Defendants may be located at:

K. P. Pierce, c/o Eva Pierce, Fairhope, Alabama

Fred Pierce, Marlow Road, Fairhope, Alabama

FILED

MAY 18 1970

ALICE J. DUCK

CLERK  
REGISTER

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Plft Ex 1

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared C. W. ARNOLD, who being first duly sworn, deposes and says that he is President of FAIRHOPE TITLE & SURVEY COMPANY, INC., which is a Corporation.

That as such President, affiant has knowledge of the account owed to FAIRHOPE TITLE & SURVEY COMPANY, INC., by Fred Pierce and K.P. Pierce, who <sup>are</sup> ~~is~~ individuals.

That the attached itemized statement is a true and correct statement of the account owed by Fred Pierce & K.P. Pierce to FAIRHOPE TITLE & SURVEY COMPANY, INC.,

That there is now owing by Fred Pierce & K.P. Pierce the sum of Three Hundred Eighteen & No/100 DOLLARS, with interest from the 2<sup>nd</sup> day of February, 1968, after allowing all credits.

Claude W. Arnold  
Notary

Subscribed and sworn to before me  
this the 27<sup>th</sup> day of April,  
1970.

Rubel E. Tancos  
Notary Public, Baldwin County,  
Alabama.

My Commission Expires June 15, 1977

# FAIRHOPE TITLE & SURVEY CO., INC.

ENGINEER  
CLAUDE W. ARNOLD  
PRESIDENT

P. O. BOX 502  
FAIRHOPE, ALABAMA 36532  
DIAN STITT ARNOLD  
SECRETARY  
TELEPHONE 928-9163

ABSTRACTORS  
J. H. ARNOLD  
GRACE A. KING  
VICE PRESIDENT

April 27, 1970

STATEMENT OF ACCOUNT: Fred Pierce & K. P. Pierce

Statement rendered January 26, 1966

Mr. Tom Taylor  
Bay Minette,  
Alabama

Account: K. P. Pierce  
Pierce Bros. FRED & K. P.

-TO-

For survey of Southeast Quarter of the Northeast Quarter  
and the East half of the Southeast Quarter of the Northeast  
Quarter Section 11, Township 7 South, Range 2 East.

. . . . . \$318.00

No. 92-58

Fred Pierce

311 White Ave.

Fairhope, Ala.

Subject is Thailand  
won't be in for  
a while.

W. E.  
5/22/70

ATTACHMENT

THE STATE OF ALABAMA, {  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, FAIRHOPE TITLE & SURVEY COMPANY, INC.

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
K. P. PIERCE, The Defendant

is justly indebted to the Plaintiff FAIRHOPE TITLE & SURVEY COMPANY, INC.

in the sum of One Hundred Fifty-nine and no/100 - - Dollars, and  
Title & Survey Co., Inc.  
CLAUDE W. ARNOLD, President of Fairhope/ having made affidavit ~~and given bond~~  
that the Defendant is a non-resident of the State of Alabama,  
~~as required by law, in such cases,~~ you are hereby commanded to attach so much of the estate of

K. P. PIERCE

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 \_\_\_\_\_ Monday of \_\_\_\_\_ 19 \_\_\_\_\_  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 24th day of February A. D., 19 71

Alice J. Duck Clerk.

No. \_\_\_\_\_

# ATTACHMENT

Vs. { ATTACHMENT

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

Moore Printing Co.

Received 24 day of Feb 1971

and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

I served a copy of the within \_\_\_\_\_

on \_\_\_\_\_

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

THE STATE OF ALABAMA,  
Baldwin County.

CASE NO. 9238

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, FAIRHOPE TITLE & SURVEY COMPANY, INC.,

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

E. P. PIERCE, the Defendant,

is justly indebted to the Plaintiff FAIRHOPE TITLE & SURVEY COMPANY, INC.,

in the sum of One Hundred Fifty-Nine and No/100 Dollars, and

CLAUDE W. ARNOLD, president of Fairhope Title & Survey Co., Inc. having made affidavit that the Defendant  
is a non resident of the State of Alabama, and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of

E. P. PIERCE

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 \_\_\_\_\_ Monday of \_\_\_\_\_ 19 \_\_\_\_\_  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this \_\_\_\_\_ day of \_\_\_\_\_ A. D., 19 \_\_\_\_\_

\_\_\_\_\_  
Clerk.

# Notice of Levy on Real Estate

Fairhope Title & Survey Co. Plaintiff,  
Inc.

vs.

K. P. Pierce

Defendant

Baldwin County Circuit Court

To Hon. Harry D'Olive Judge of Probate, Baldwin County, Alabama:

Notice is hereby given that under a Writ of Attachment

issued in favor of the Plaintiff in above entitled cause, I have levied on the following described property of said Defendants, described as follows, viz:-----

E. 1/2 of SW 1/4 of N.E. 1/4 and the E 1/2 of W 1/2  
of S.W. 1/4 of N.E. 1/4 of Sec. 11 T-75 Range 2 E.

STATE OF ALABAMA,  
BALDWIN COUNTY,

I certify that this instrument was filed RE

MAR 16 1971 4:10 P

and that no tax was collected. Recorded in US Perso.

Book 6  
Page 223 Harry D'Olive  
Judge of Probate  
By [Signature]

The above described Real Estate being in Baldwin County, Alabama

Given under my hand this 26 day of February 19 71

Taylor Wilkins  
Sheriff of Baldwin County, Alabama

CONFIDENTIAL - SECURITY INFORMATION

CONFIDENTIAL - SECURITY INFORMATION

CONFIDENTIAL - SECURITY INFORMATION

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Sherry Watkins

R-50

LAW OFFICES  
RICKARBY & BENTON

ATTORNEYS AT LAW  
35 SOUTH SECTION STREET  
P. O. BOX 471  
FAIRHOPE, ALABAMA 36532

E. G. RICKARBY  
DANIEL A. BENTON

TELEPHONE  
(205) 928-2308

December 22, 1970

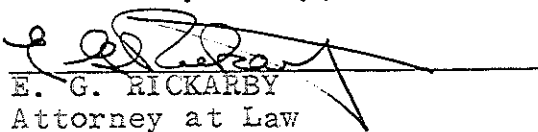
Mrs. Eunice Blackmon  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

Inre: Fairhope Title & Survey Co., Inc.  
vs. Fred Pierce and K. P. Pierce  
Case No. 9258                      File #69-353

Enclosed find Notice of Attachment by Publication, about which I phoned you. Please proceed with this and notify me what the trouble.

Yours very truly,

  
E. G. RICKARBY  
Attorney at Law

EGR/jc  
Encl.

*No Property Attached  
or no return on writ.*

FAIRHOPE TITLE & SURVEY  
COMPANY, INC.,

Plaintiff,

VS.

FRED PIERCE AND K. P. PIERCE,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

CASE NO.

9258

NOTICE OF ATTACHMENT BY PUBLICATION

Whereas, the Plaintiff, FAIRHOPE TITLE & SURVEY COMPANY, INC., in the above styled cause sued out in said Court, a Writ of Attachment against the estate of K. P. PIERCE; and Whereas, said Writ of Attachment was executed by the Sheriff of Baldwin County, Alabama, on, to-wit, the \_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by levying upon the following described property of the Defendant, to-wit:

The Eastern Three-fourths (3/4) of the Southwest Quarter of the Northeast Quarter of Section 11, Township 7 South, Range 2 East, Baldwin County, Alabama, containing Thirty (30) acres, more or less.

And Whereas, the Defendant is a non-resident of the State of Alabama, and the place of residence and post office address of said Defendant is P. O. Box 3531 Firestone Drive, Pensacola, Florida.

NOW THEREFORE, the Defendant, K. P. PIERCE, is hereby notified of the issuance of attachment execution thereof and to be and appear, if he thinks proper, to defend said suit at the present term of the Circuit Court and within thirty (30) days after this notice by publication is completed.

WITNESS my hand this 29 day of Dec, 1976.

Reece J. Bush  
CIRCUIT CLERK

THE STATE OF ALABAMA,  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, FAIRHOPE TITLE & SURVEY COMPANY, INC.

bath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
K. P. PIERCE, The Defendant

is justly indebted to the Plaintiff FAIRHOPE TITLE & SURVEY COMPANY, INC.

in the sum of One Hundred Fifty-nine and no/100 - -

CLAUDE W. ARNOLD, President of Fairhope/ Title & Survey Co., Inc. Dollars, and  
that the Defendant is a non-resident of the State of Alabama, having made affidavit and given bond  
~~xxx required by law xxx xxx xxx xxx~~ you are hereby commanded to attach so much of the estate of

K. P. PIERCE

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 \_\_\_\_\_ Monday of \_\_\_\_\_ 19\_\_\_\_  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 24th day of February A. D., 1971

*Alice J. Duck* Clerk.

No. 9258

## ATTACHMENT

FAIRHOPE TITLE & SURVEY CO., INC

Vs.

ATTACHMENT

K. P. PIER CE

Issued 2nd copy 2/24/71, 19...

Moore Printing Co.,

E. G. Rickarby, Atty.

Received 24 day of Feb 19 71  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

I served a copy of the within Attachment  
on \_\_\_\_\_

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

3-16-71

Returned Not Found

Taylor Wilkins  
Sheriff

by: JMB

3-19-71

Property here in described  
levied on by filing Notice of  
Levy with Probate Court,  
Baldwin Co. Alabama

Taylor Wilkins  
Sheriff

by: JMB

FAIRHOPE TITLE & SURVEY  
COMPANY, INC.,

Plaintiff,

VS.

FRED PIERCE AND K. P. PIERCE,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

CASE NO.

9258

NOTICE OF ATTACHMENT BY PUBLICATION

Whereas, the Plaintiff, FAIRHOPE TITLE & SURVEY COMPANY, INC., in the above styled cause sued out in said Court, a Writ of Attachment against the estate of K. P. PIERCE; and Whereas, said Writ of Attachment was executed by the Sheriff of Baldwin County, Alabama, on, to-wit, the \_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by levying upon the following described property of the Defendant, to-wit:

The Eastern Three-fourths (3/4) of the Southwest Quarter of the Northeast Quarter of Section 11, Township 7 South, Range 2 East, Baldwin County, Alabama, containing Thirty (30) acres, more or less.

And Whereas, the Defendant is a non-resident of the State of Alabama, and the place of residence and post office address of said Defendant is P. O. Box 3531 Firestone Drive, Pensacola, Florida.

NOW THEREFORE, the Defendant, K. P. PIERCE, is hereby notified of the issuance of attachment execution thereof and to be and appear, if he thinks proper, to defend said suit at the present term of the Circuit Court and within thirty (30) days after this notice by publication is completed.

WITNESS my hand this 29 day of Dec, 1916.

Allice J. Duck  
CIRCUIT CLERK

FAIRHOPE TITLE & SURVEY COMPANY, INC. X

Plaintiff,

VERSUS

FRED. PIERCE & K. P. PIERCE,

Defendant.

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

X AT LAW.

X CASE NO. 9258

OATH FOR ATTACHMENT

Before me, the undersigned Notary Public, personally appeared CLAUDE W. ARNOLD, who being first duly sworn, deposes and says that the Defendant, K. P. PIERCE, is justly indebted to the Plaintiff in the sum of ONE HUNDRED FIFTY-NINE (\$159.00) DOLLARS, which sum is justly due and that the Defendant, K. P. PIERCE, resides out of the State of Alabama and that the Attachment is not sued out for the purpose of vexing and harrassing the Defendant.

Claude W. Arnold  
AFFIANT

Subscribed and Sworn to before me this the

15 day of June, 1970.

[Signature]  
Notary Public, Baldwin County, Alabama.

**FILED**

JUN 26 1970

**ALICE J. DUCK** CLERK  
REGISTER

STATE OF ALABAMA,

COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, personally appeared CLAUDE W. ARNOLD, who being first duly sworn, deposes and says that the Defendant in this case is a non-resident of the State of Alabama and that his residence is known and that his Post Office residence is P. O. Box 3531 Firestone Drive, Pensacola, Florida;

Wherefore, Plaintiff prays that service be had upon the Defendant, K. P. PIERCE, by Registered Mail.

Claude W. Arnold  
Affiant

Subscribed and Sworn to before me this the

day of 15 June, 1970.

[Signature]  
Notary Public, Baldwin County, Alabama.

**FILED**

JUN 26 1970

**ALICE J. DUCK** CLERK  
REGISTER

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon FRED PIERCE and K. P. PIERCE 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 FRED PIERCE and K. P. PIERCE, Defendants, by FAIRHOPE TITLE & SURVEY COMPANY, INC., Plaintiff.

WITNESS my hand this 18 day of May, 1970.

Allice J. Duck  
Clerk.

FAIRHOPE TITLE & SURVEY COMPANY,  
INC.,

Plaintiff,

VERSUS

FRED PIERCE and K. P. PIERCE,

Defendants.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

9258

C O M P L A I N T

Count I.

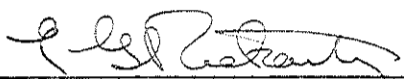
The Plaintiff claims of the Defendants THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them by account, on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendants the sum of THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them by account stated between the Plaintiff and the Defendants on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendants the sum of THREE HUNDRED EIGHTEEN AND NO/100 (\$318.00) DOLLARS due from them for professional engineering services rendered by the Plaintiff to the Defendant, on, to-wit, the 26th day of February, 1966, which sum of money with the interest thereon is still unpaid.

  
\_\_\_\_\_  
E. G. RICKARD, Attorney for  
Plaintiff.

Defendants may be located at:

K. P. Pierce, c/o Eva Pierce, Fairhope, Alabama

Fred Pierce, Marlow Road, Fairhope, Alabama

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared C. W. ARNOLD, who being first duly sworn, deposes and says that he is President of FAIRHOPE TITLE & SURVEY COMPANY, INC., which is a Corporation.

That as such President, affiant has knowledge of the account owed to FAIRHOPE TITLE & SURVEY COMPANY, INC., by FRED Pierce and K.P. Pierce, who <sup>Are</sup> ~~is an~~ individuals.

That the attached itemized statement is a true and correct statement of the account owed by FRED Pierce & K.P. Pierce to FAIRHOPE TITLE & SURVEY COMPANY, INC.,

That there is now owing by Fred Pierce & K.P. Pierce the sum of Three Hundred Eighteen & No/100 DOLLARS, with interest from the 26th day of February, 1966, after allowing all credits.

Claudio W. Arnold  
Affiant

Subscribed and sworn to before me  
this the 27th day of April,  
1970.

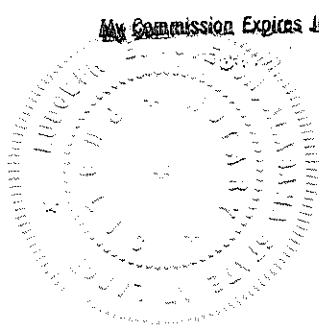
Rudolph E. Turner  
Notary Public, Baldwin County,  
Alabama.

FILED

MAY 18 1970

ALICE J. DUCK  
CLERK  
REGISTER

My Commission Expires June 14, 1977



# FAIRHOPE TITLE & SURVEY CO., INC.

ENGINEER  
CLAUDE W. ARNOLD  
PRESIDENT

P. O. BOX 502  
FAIRHOPE, ALABAMA 36532  
DIAN STITT ARNOLD  
SECRETARY  
TELEPHONE 928-9163

ABSTRACTORS  
J. H. ARNOLD  
GRACE A. KING  
VICE PRESIDENT

April 27, 1970

STATEMENT OF ACCOUNT: Fred Pierce & K. P. Pierce

Statement rendered January 26, 1966

Mr. Tom Taylor  
Bay Minette,  
Alabama

Account: K. P. Pierce  
Pierce Bros. FRED & K. P.

-TO-

For survey of Southeast Quarter of the Northeast Quarter  
and the East half of the Southeast Quarter of the Northeast  
Quarter Section 11, Township 7 South, Range 2 East.

. . . . . \$318.00

No. 94-58

Fairhope Title & Survey Co.

VS  
Fred Pierce MARLOW RD  
K. P. Pierce  
FAIRHOPE  
ALA  
6-2728

# FILED

MAY 18 1970

**ALICE J. DUCK** CLERK  
REGISTER

CLERK  
REGISTER

E. G. A

Returned  
Not found in my country after diligent search and  
quinta.

Received 12 day of March 1975  
and on 12 day of March 1975  
I served a copy of the within 2001  
on Mr. James A. J. J. J.

by service on

TAYLOR WILKINS, Sheriff

64

LAW OFFICES  
RICKARBY & BENTON  
P.O. BOX 471  
FAIRHOPE, ALABAMA 36532

*Attachment not  
returned*

Mrs. Eunice Blackmon  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507



Spending Mr. West  
w. e. m.  
D. W. I  
100.00

Spending  
257  
100  
440  
11.17