

## SUMMONS AND COMPLAINT

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9494

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ED SELLEW

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.....

ED SELLEW, Defendant.....

by CLINTON BURT, a/b/a BURT'S EQUIPMENT AND REPAIR SHOP

Plaintiff.....

Witness my hand this 22nd day of Sept 1970

Clerk

ABD REPAIR SHOP

vs

ED SELLEW

Received on the 25th day of September, 1970, and on the 29th day of October, 1970, I executed the within writ of attachment by levying on personal property of the defendant, as per attached levy. A copy of the notice of levy of attachment and a copy of the Complaint and Summons was served on the said defendant on the 2nd day of December, 1970. This writ is herewith returned for further action by the court.

RAY D. BRIDGES, SHERIFF  
MOBILE, COUNTY, ALABAMA

BY L. B. Smith D.S.

836

No. 9494

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CLINTON BURT, d/b/a

BURT'S EQUIPMENT AND REPAIR  
SHOP

Plaintiffs

vs.

ED SELLEW

Defendants

SUMMONS AND COMPLAINT

Filed SEP 22 1970 19.....

Clerk

CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Mobile Cty.

Received In Office

Sept 22

Taylor Wilkins

I have executed this summons

this Dec 2

by leaving a copy with

Ed Sellow

Ray H. Bridges

L.B. Smith Deputy S

CIRCUIT COURT BALDWIN COUNTY

CASE #9494

CLINTON BURK d/b/a BURT'S EQUIPMENT  
ABD REPAIR SHOP

vs

ED SELLEW

Received on the 25th day of September, 1970, and on the 29th day of October, 1970, I executed the within writ of attachment by levying on personal property of the defendant, as per attached levy. A copy of the notice of levy of attachment and a copy of the Complaint and Summons was served on the said defendant on the 2nd day of December, 1970. This writ is herewith returned for further action by the court.

RAY D. BRIDGES, SHERIFF  
MOBILE, COUNTY, ALABAMA

BY L. B. Smith D.S.

VOL 67 PAGE 706

No. 9494

STATE

Ba

CIRCO

CLINTO

BURT'S EQU

SHOP

ED. SE

SUMMONS

Filed

CLINTON BURT, d/b/a  
BURT'S EQUIPMENT AND  
REPAIR SHOP,

Plaintiff,

- -vs-

ED SELLEW,


Defendant.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

CASE NO. 9494

The Plaintiff claims of the Defendant Sixteen Hundred  
Fifty and 10/100 (\$1650.10) Dollars due from him for work  
and labor done and materials furnished for the Defendant by  
the Plaintiff on to-wit: February 1, 1970, at his request,  
which sum of money with interest thereon is still unpaid.

  
ATTORNEY FOR PLAINTIFF

1650.10  
1055  
825050  
825050  
9075550

1650.10  
90.25  
1740.85

FILED

SEP 22 1970

ALICE J. DUCK CLERK  
REGISTER

THE STATE OF ALABAMA, {  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, CLINTON BURT, d/b/a BURT'S EQUIPMENT AND REPAIR  
SHOP

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

is justly indebted to the Plaintiff CLINTON BURT, d/b/a BURT'S EQUIPMENT AND  
REPAIR SHOP

in the sum of \$1650.10 Dollars, and  
the said CLINTON BURT 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  
ED SELLEW, to-wit: One tree-length pole or log trailer,  
completely constructed by the said Clinton Burt, and in the  
possession of the said Ed Sellow

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

WITNESS, my hand, this 22nd day of Sept A. D., 1970.

Alice J. Duck Clerk.

# NOTICE OF LEVY OF ATTACHMENT

CLINTON BURT d/b/a BURT'S EQUIPMENT AND REPAIR SHOP

Complainant,

No. 9494

vs.

ED SELLEW

Defendant,

TO: Ed Sellow

Notice is hereby given that in the above entitled cause on the 22nd day of September, 1970  
Baldwin  
Circuit  
an attachment was issued out of the \_\_\_\_\_ Court of \_\_\_\_\_ County, Alabama, at the suit  
of Clinton Burt, d/b/a Burts Equip., Plaintiff, versus Ed Sellow, Defendant, for  
the sum of \$ 1650.10, and that said attachment was executed by the undersigned on the \_\_\_\_\_ day of  
\_\_\_\_\_, 19\_\_\_\_, by taking into my possession and levying upon all of the right, title and  
interest of said defendant in and to the following described property, viz:

(Here Describe Property)

**1 - Tree Length Pole or Log Trailer**

Notice is therefore given you to appear in said Court within the time provided by Law and defend said cause if you think proper.

WITNESS my hand this 29 day of October, 1970

Ray L. Bridges  
Sheriff of Mobile County, Alabama

L. B. Smith  
Deputy Sheriff

file  
7646 m

CIRCUIT COURT BALDWIN COUNTY

CASE #9494

CLINTON BURK d/b/a BURT'S EQUIPMENT  
ABD REPAIR SHOP

VS

ED SELLEW

Received on the 25th day of September, 1970, and on the 29th day of October, 1970, I executed the within writ of attachment by levying on personal property of the defendant, as per attached levy. A copy of the notice of levy of attachment and a copy of the Complaint and Summons was served on the said defendant on the 2nd day of November, 1970. This writ is herewith returned for further action by the court.

RAY D. BRIDGES, SHERIFF  
MOBILE, COUNTY, ALABAMA

BY L. B. Smith D.S.



THE STATE OF ALABAMA {  
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, Clinton Burt andOscar Howard and Donald N. Wilson

....., of the County of Baldwin State of Alabama

are held and firmly bound unto Ed Sellowin the sum of \$3300.20 Dollars, to

be paid to the said Ed Sellow  
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 Clinton Burt

..... has, on the day of the date  
hereof, prayed an Attachment at the suit of Clinton Burt, d/b/a Burt's Equipment  
and Repair Shop against the estate of above named  
Ed Sellow

for the sum of \$1650.10 Dollars,  
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said Clinton Burt

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

Clinton Burt (Seal)

Oscar Howard (Seal)

Donald N. Wilson (Seal)

..... (Seal)

Approved, this 22nd day of Sept, 1970

Alvin J. Shuck, Clerk

THE STATE OF ALABAMA }  
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, C. LeNoir Thompson, a Notary Publicin and for said County, personally appeared Clinton Burt

who, being duly sworn, on oath saith that

Ed Sellew

justly indebted to

Clinton Burt of Burt's Equipment and Repair Shop

in the sum of

Dollars,

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

Ed Sellew has monies, property or effects liable to satisfy  
his debts, which he fraudulently withholds

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

23 day ofApril1920Clinton BurtC. LeNoir Thompson  
Notary PublicEd Sellew  
1/24/20

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

STATE OF ALABAMA  
Baldwin County  
CIRCUIT COURT  
At Bay Minette, Ala.

Clinton Burt d/b/a

Burt's Equipment & Repair  
Shop  
TO

Ed Sellew

## ATTACHMENT BOND AND AFFIDAVIT

Filed this the \_\_\_\_\_ day

of \_\_\_\_\_, 19 \_\_\_\_

\_\_\_\_\_, Clerk

\_\_\_\_\_, Attorney