

SUMMONS

THE STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon L. K. HOOVER 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, Alabama, at the place of holding same by AVCO NEW IDEA FARM EQUIPMENT CO. DIV.

Witness my hand this the 24 day of Jan., 1972.

Eunice B. Blackmon
Clerk

* * * * *

COMPLAINT

Avco New Idea Farm
Equipment Co. Div.,

PLAINTIFF

-VS-

L. K. Hoover,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

10,209

The plaintiff claims of the defendant THREE THOUSAND, TWO HUNDRED TWO & 3/100 DOLLARS, (\$3,202.03) due by promissory waive note made by him on the 3rd day of November, 1971, and payable on the 15th day of December, 1971, with interest thereon.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be \$160.00.

James C. Cline
Attorney for Plaintiff

The Defendant's address is:

Robertsdale, Alabama

FILED

JAN 24 1972

EUNICE B. BLACKMON
CLERK

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA 36535

Received 24 day of January 1972
and on 26 day of Jan - 1972

I served a copy of the within on B. K. Hoover

By service on _____

TAYLOR WILKINS, Sheriff
By *L. K. Hoover* D. 3.
Don R. Dale

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY *B. K. Hoover*
DEPUTY SHERIFF

10,209

SUMMONS & COMPLAINT

Avco New Idea Farm Equipment
Co. Div.,
Plaintiff,
To:
L. K. Hoover,
Defendant.

JAN 24 1972
TAYLOR WILKINS
SHERIFF
FILED
JAN 24 1972
EUNICE B. BLACKMON CIRCUIT
CLERK

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201
FOLEY, ALABAMA 36535

March 14, 1972

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: 642902 Avco New Idea Farm
Equipment Co., Div.

Vs: L. K. Hoover

10,209

Dear Judge:

Kindly render a judgment in this case based on a promissory
waive note which is attached in the amount of \$3202.03 principal,
interest, \$48.00 and attorney fee, \$160.00 for a total of
\$3400.00 which is a conservative rounded figure.

Cordially yours,


FOREST A. CHRISTIAN

FILED

MAR 15 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

WRIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office, this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

Claudie Mae Hoover Bancroft
Check with Mr. John P. Beebe for
her address.
B. H. Hoover

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 190
MOLEY, ALABAMA 36039

WRIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae HooverBancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office, this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

D. H. Blackerby, Sr.
Check with Mr. John Beebe
for his address.

B. K. Horn

FOREST A. CHRISTIAN
Attorney at Law
P. O. DRAWING
TULEY, ALABAMA 36688

WRIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae HooverBancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office,
this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

*C. V. Hoover, Jr.
Lives east of Francis Irwin
but runs Hoovers Superette.*

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 100
FOLEY, ALABAMA 36527

WRIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae HooverBancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office,
this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

ENTERED & RECORDED
CLERK OF COURT
BALDWIN COUNTY, ALABAMA

Original for clerk

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 190
FOLEY, ALABAMA 36538

Returned 5 day of Oct 1972
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins Sheriff
Brown
Deputy Sheriff

to any Sheriff of the State of Alabama - Owing:

Whereas Forest A. Christian has made affidavit as required

by law that says New Idea Farm Equipment Company Division of the

County, 1972 term of the Circuit Court of Baldwin County recovered

judgment against L. E. Hoover for the sum of \$3,400.00, and the

cost of said suit, and that he believes the

process of judgment is necessary to obtain satisfaction of

his judgment. T. Wilkins and L. E. Hoover have in

the past been in the possession of the property of said

judgment, and the Sheriff is authorized to levy on the

property of said judgment, and the Sheriff is authorized to

levy on the property of said judgment, and the Sheriff is

authorized to levy on the property of said judgment, and the

10,209 1/2

Arco New Idea Farm

Equipment Co. Division

L. E. Hoover

Notice to Debt of
Writ of Garnishment

RECEIVED

SEP 26 1972

TAYLOR WILKINS
SHERIFF

J. A. Christian, Atty

Received 26 day of Sept. 1972
and on _____ day of _____ 19____

I served a copy of the within Writ
on B. K. Hoover, C.V.
Hoover, J.F., John P. Beebe, Esq.

By service on _____

TAYLOR WILKINS, Sheriff
By Brown D.S.

Received 26 day of Sept. 1972
and on _____ day of _____ 19____

I served a copy of the within Writ
on Charles M. H. Barcott, D.J.
Blackley, Jr.

By service on _____

TAYLOR WILKINS, Sheriff
By _____ D.S.

Sheriff claims 100 miles at
Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
BY Brown DEPUTY SHERIFF

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

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

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

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 100
MOLEY, ALABAMA 36535

WRIT ON JUDGMENT

SEP 26 1972 11:59 AM

THE STATE OF ALABAMA,
BALDWIN COUNTY.

and that no tax was collected. Recorded in

Book 30 Page 213 Judge of Probate

By Ma

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office, this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

For file in Probate
office for estate of C. V. Hoover, Sr. to be filed
as claim.

20 213

FOR FILE IN PROBATE
OFFICE
P. O. DRAWER 150
MOBILE, ALABAMA 36681

5.

Thrift Savings

R-50

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 180
FOLEY, ALABAMA 36528

WRIT ON JUDGMENT

SEP 26 1972 11:15 A M

THE STATE OF ALABAMA,
BALDWIN COUNTY.

And that no tax was collected. Recorded in
Book 320 Page 314
Judge of Probate
me

To Any Sheriff of the State of Alabama - Greeting:

Whereas Forest A. Christian has made affidavit as required by law that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County recovered a judgment against L. K. Hoover for the sum of \$3,400.00, and the further sum of \$33.00, cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment C. V. Hoover and Daisy O. Hoover estates has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

These are therefore to command you, that you summon the said L. K. Hoover, C. V. Hoover, Jr., Claudie Mae HooverBancroft and D. H. Blackerby, Sr. as executors of said estate and John P. Beebe, Esquire, as attorney, as provided under Title 7, Section 1003, Code of Alabama.

Witness, Eunice Blackmon, Clerk of said Court at office, this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

NOTICE TO DEFENDANT

To Any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify estates of C. V. Hoover, Sr. and Daisy O. Hoover, L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. as executors of said estate as provided in Title 7, Section 1003, Code of Alabama, that on the 25th day of September, 1972, a writ of garnishment in the above stated case was issued to Avco New Idea Co., as garnishee.

And you will return this writ according to law.

Witness my hand this 25th day of September, 1972.

Eunice B. Blackmon
Clerk

For file in Probate office for
estate of Daisy O. Hoover to be
filed as claim.

FOREST A. CHS
ATTORNEY AT LAW
P. O. DRAWER 190
FOLEY, ALABAMA 36054

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 180
MOLEY, ALABAMA 36527

Shirley Wilson

G. 50


#10,209 1/2

AFFIDAVIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Personally appeared before me, Eunice Blackmon, Clerk of the Circuit Court in and for said County of Baldwin, who being duly sworn, deposes and saith that Avco New Idea Farm Equipment Company Division at the March, 1972 term of the Circuit Court of Baldwin County, Alabama, recovered a judgment against L. K. Hoover for the sum of \$3,400.00 and the further sum of \$33.00 cost of suit, which judgment is recorded in Book 19, page 779, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that the estate of C. V. Hoover, Sr. and/or the estate of Daisy O. Hoover is believed to have in its possession or under its control, monies belonging to the defendant, or is liable to him on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

L. K. Hoover is believed to be a legatee or distributee of these estates. As provided for in Title 7, Section 1003, Code of Alabama, and that L. K. Hoover, C. V. Hoover, Jr., Claudie Mae Hoover Bancroft and D. H. Blackerby, Sr. are Executors and John P. Beebe, Esquire, is attorney for said estates.


Forest A. Christian, attorney
for judgment creditor

Sworn to and subscribed before me
this 22nd day of September, 1972.


Era Mae Bullard
Notary Public, Baldwin County, Alabama

FILED

SEP 25 1972

EUNICE B. BLACKMON CIRCUIT CLERK

AVCO NEW IDEA FARM EQUIPMENT,
Plaintiff,
vs
L. K. HOOVER,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
No. 10,209½

Personally appeared before me R. A. Hail, Jr., a Notary Public, in and for said State of Alabama, and County of Baldwin, John P. Beebe, who is personally known to me, who being by me duly sworn, on oath, says: that he is the attorney for the Estate of Claude Victor Hoover, Deceased, and answering the garnishment therein he says that the garnishee is not nor indebted to the said Defendant in any sum whatever, and was not indebted to him at the time of the service of this garnishment, nor at any time intervening between the time of the service of the garnishment and the making of this answer, and that he will not be indebted in the future to the said defendant by any contract then or now existing, and that he will not be liable to the said Defendant for the delivery of any personal property by any contract then or now existing, for the delivery of personal property, nor for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and that he has not in his possession or under his control money or effects belonging to the said Defendant.

John P. Beebe

Sworn to and wubscribed before me on this the 6th day of October, 1972.

Prüfung

Notary Public

FILED

OCT 6 1972

EUNICE B. BLACKMON CIRCUIT CLERK

\$3,202.03

\$ 3,202.03

Foley, Ala. November 3

19 71

On or before December 15, 1971 after date, without grace I promise to pay
to the order of Forest A. Christian, Atty. for Avco New Idea Farm Equip.
Co.
THREE THOUSAND TWO HUNDRED TWO & 3/100 . . . Dollars

for value received, with interest at 6 per cent. per annum from maturity
until paid.

office of Forest A. Christian, attorney

PAYABLE AT ~~FARMERS AND MERCHANTS BANK~~, FOLEY, ALA.

The parties to this instrument, whether maker, endorser, surety or guarantor, each for himself, hereby severally agrees to pay this note and waives as to this debt, or any renewal thereof, all right to exemption under the constitution and laws of Alabama, or any other State, as to personal property and they each severally agree to pay all costs of collecting or securing, or attempting to collect or secure this note, including a reasonable attorney's fee, whether the same be collected or secured by suit or otherwise, and maker, endorser, surety or guarantor, of this note severally waives demand, presentment, protest, notice of protest, suit and all other requirements necessary to hold them, and they agree that time of payment may be extended without notice to them of such extension. The Bank at which this note is payable is hereby authorized to apply on or after maturity to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.

L. K. Hoover

Seal

Robertsdale, Alabama

Seal

No.

Due December 15, 1971

The endorser of this note agree to pay all cost of collection, including a reasonable attorney's fee, whether costs are incurred by suit against any one or more of the makers or endorser, or otherwise; and each endorser expressly waives all right to claim exemptions under the Constitution and Laws of the State of Alabama, or any of these United States, as to this debt should this note not be paid at maturity. Presentment for payment, notice and protest and all steps necessary to bind each endorser hereon on the non-payment of this note are hereby waived by each endorser. Time for payment may be extended without notice. The said Farmers and Merchants Bank, Foley, Ala. is hereby authorized by each surety and endorser hereof to apply on or after maturity to the payment of this debt any funds belonging to any endorser on this note.