

STATE OF ALABAMA
COUNTY OF BALDWIN

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Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON THOMAS RAYBORN TO APPEAR
AND ANSWER, PLEAD OR DEMUR, WITHIN THIRTY DAYS FROM THE DATE HERE-
OF OF THIS SERVICE, TO A BILL OF COMPLAINT FILED AGAINST HIM IN
CIRCUIT COURT, AT LAW, FOR SAID COUNTY AND SAID STATE BY JULIAN
FAYARD.

HEREIN FAIL NOT, DUE RETURN MAKE OF THIS WRIT AS THE LAW DIRECTS.
WITNESS MY HAND THIS 16 DAY OF MAY, 1972.

Eunice B. Blackmon
CLERK

JULIAN FAYARD

Ø

PLAINTIFF,

Ø

Vs.

Ø

THOMAS RAYBORN

Ø

DEFENDANT,

Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO: 10,396

COUNT ONE:

PLAINTIFF CLAIMS OF THE DEFENDANT, TO-WIT, THE SUM OF THREE
HUNDRED EIGHTY FIVE DOLLARS (\$385.00) DUE FROM HIM FOR THE USE OF
AND RENTAL OF THOSE PREMISES LOCATED AT 409 AZALEA STREET, FAIRHOPE,
ALABAMA, FROM TO-WIT, AUGUST 1971 UNTIL TO-WIT, FEBRUARY 1972, WHICH
SUM OF MONEY, WITH INTEREST THEREON IS STILL UNPAID.

BAILEY & TAYLOR

BY: Lloyd E. Taylor
ATTORNEYS FOR THE PLAINTIFF

FILED

MAY 16 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

CASE NO: 10,396

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

JULIAN FAYARD

PLAINTIFF

Vs.

THOMAS RAYBORN

DEFENDANT 9289812

TO ANY SHERIFF OF THE
STATE OF ALABAMA:

DEFENDANT MAY BE

SERVED AT:

HIS HOME IN

FAIRHOPE, ALABAMA

FILED MAY 16 1972

MAY 16 1972

EUNICE B. BLACKMON
CIRCUIT
CLERK

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY W. J. Rayborn DEPUTY SHERIFF

Received 16 day of May 1972
and on 22 day of May 1972
I served a copy of the within
on Thomas Rayborn

By service on Thomas Rayborn
TAYLOR WILKINS, Sheriff
BY W. J. Rayborn D.S.

SNOW 228/71
4002

BAILEY, TAYLOR & BENTON

ATTORNEYS AT LAW
61 NORTH SECTION STREET
P. O. BOX 361

FAIRHOPE, ALABAMA 36532

ERNEST M. BAILEY
LLOYD E. TAYLOR
DANIEL A. BENTON

TELEPHONES
(205) 928-2393
(205) 928-2308

March 18, 1975

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

Re: Julian Fayard v. Thomas Rayborn
Civil Action No. 10,396-1/2

Dear Judge Mashburn:

We respectfully request that this garnishment be dismissed.

Respectfully submitted,


Daniel A. Benton

DAB:w
cc-Mrs. Eunice Blackmon, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 19...73....., of the Circuit Court of Baldwin County, to-wit: On the ...12th... day of ...Marcy....., 1973..., being a regular day of said term,JULIAN FAYARD.....

recovered judgment againstTHOMAS RAYBORN.....

for the sum of ..THREE HUNDRED EIGHTY-FIVE AND NO/100..... Dollars, and cost of suit, and affidavit having been made byDANIEL A. BENTON..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

.....ALABAMA STATE DOCKS.....

has or is believed to have inits..... possession, or underits..... control money or effects belonging to said defendant or thatit..... is, or is believed to be indebted to said defendant or to be liable to them, or to one of them on a contract for the delivery of personal property, 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.

You Are Therefore Hereby Commanded to SummonALABAMA STATE DOCKS.....

to file an answer in duplicate to the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, within 30 days from the service of the garnishment, or at the making ..its.. answer, or at any time intervening the time of serving the garnishment, and making the answerit..... was indebted to said defendant and whetherit..... will not be indebted in future to said defendant by a contract then existing, and whether by a contract then existingit..... is, or are, liable to said defendants for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whetherit..... has not inits..... possession or underits..... control money or effects belonging to the defendant.....

Herein fail not, and have you then and there this Writ.

Witness,, Clerk of said Court, this...12... day of ...August... A. D., 19...74...

Issued12... day of ...August... A. D., 19...74...

ATTEST:

.....Ernie B. Blackman..... Clerk

Received 14 Day of Aug. 1974
and on 5 Day of Sept. 1974
I served a Copy of the within Garnishment
on Wahana Hale Dock
by service on Mr. Hatter, Comptroller.

RAY D. BRIDGES, Sheriff
By P. J. Farries D. S.

REC'D SHERIFF DEPT.
MOBILE COUNTY, ALA.
AUG 14 9 33 AM '74
RECEIVED
AUG 12 1974
BY TAYLOR WILKINS
SHERIFF

Jarvis *10861*
CIRCUIT COURT, BALDWIN COUNTY
[Signature]
No. 10,396 1/2
JULIAN FAYARD
VS. } GARNISHMENT ON JUDGMENT
THOMAS RAYBORN
Garnishee: 958 Jarvis
ALABAMA STATE DOCK
Ms. Hatter, Compt.
Issued _____ day of _____ 19____
Returnable _____ day of _____ 19____
DANIEL A. BENTON
Attorney
Moore Printing Co. - Bay Minette, Ala.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT

EUNICE B. BLACKMON

Personally appeared before me, ~~XXXXXX~~, Clerk of the Circuit Court in and for Baldwin County and

State aforesaid.....DANIEL A. BENTON.....

who being duly sworn, on oath says, that a regular.....Term

of the Circuit Court of Baldwin County, to-wit: on the.....12th.....day of.....March.....

19 74,.....JULIAN FAYARD.....

recovered a judgment against.....THOMAS RAYBORN.....

.....for the sum of

.....THREE HUNDRED EIGHTY FIVE AND NO/100.....Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

.....ALABAMA STATE DOCKS.....

.....supposed to be indebted to or have effects of the said.....THOMAS RAYBORN.....

in.....its.....possession, or under.....its.....control, and that he believes process of

Garnishment against said.....THOMAS RAYBORN.....

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this.....12th.....

day of.....August.....A. D. 19 74

.....Eunice B. Blackmon.....EUNICE B. BLACKMON circuit
Clerk. CLERK

FILED

AUG 12 1974

NO. 10,396 1/2

CIRCUIT COURT

VS.

**AFFIDAVIT
Garnishment on Judgment**

Filed this _____ day of _____, 19____

Clerk.

STATE OF ALABAMA }

Baldwin County

TO THOMAS RAYBORN Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

JULIAN FAYARD Plaintiff:

versus THOMAS RAYBORN Defendant:

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

ALABAMA STATE DOCKS

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 12

day of August, 1974


Clerk of the Circuit Court.

Mobile

RECEIVED

AUG 12 1974

TAYLOR WILKINS
SHERIFF

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

NF TO

.....THOMAS..RAYBORN.....

.....JULIAN..FAYARD.....

Plaintiff....

VS.

.....THOMAS..RAYBORN.....

Defendant....

RETURNED 9-6-74

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By P. Larris D.S.

ALABAMA STATE DOCKS DEPARTMENT
AN AGENCY OF THE STATE OF ALABAMA

SECRETARY-TREASURER'S OFFICE
P. O. DRAWER 1588
MOBILE, ALABAMA



September 5, 1974

Mrs. Eunice B. Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama

Dear Mrs. Blackmon:

I am returning Garnishment on Thomas Rayborn, No.
10396 1/2
~~10306~~ 1/2, as we do not have Mr. Rayborn employed
at the Alabama State Docks Department.

Very truly yours,

Forney K. Hatter, Jr.
Forney K. Hatter
Acting Secretary-Treasurer

FKH:msb

encl.

FILED

SEP 9 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA
Baldwin County

TOTHOMAS RAYBORN....., Defendant.....:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

JULIAN FAYARD Plaintiff.....

versusTHOMAS RAYBORN..... Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

.....ALABAMA STATE DOCKS.....

has.... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 12

day of August, 1924

Ernest B. Blackman
Clerk of the Circuit Court.

Baldwin Co. Notice ¹⁶

Thomas Rayborn

NF
NE

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY
 TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 19...73....., of the Circuit Court of Baldwin County, to-wit: On the ...12th..... day ofMarcy....., 1973..., being a regular day of said term,JULIAN FAYARD.....

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for the sum of ...THREE..HUNDRED..EIGHTY-FIVE..AND..NO/100..... Dollars, and cost of suit, and affidavit having been made byDANIEL A. BENTON..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

.....ALABAMA STATE DOCKS.....

has or is believed to have inits..... possession, or underits..... control money or effects belonging to said defendant or thatit..... is, or is believed to be indebted to said defendant or to be liable to them, or to one of them on a contract for the delivery of personal property, 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.

You Are Therefore Hereby Commanded to SummonALABAMA STATE DOCKS.....

to file an answer in duplicate to the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, within 30 days from the service of the garnishment, or at the making ...its answer, or at any time intervening the time of serving the garnishment, and making the answerit..... was indebted to said defendant and whetherit..... will not be indebted in future to said defendant by a contract then existing, and whether by a contract then existingit..... is, or are, liable to said defendants for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whetherit..... has not inits..... possession or underits..... control money or effects belonging to the defendant.....

Herein fail not, and have you then and there this Writ.

Witness, Clerk of said Court, this...12... day of ...August... A. D., 1974

Issued12... day of ...August... A. D., 1974

ATTEST:

Guise B. Blackman Clerk

Jarvis

10

CIRCUIT COURT, BALDWIN COUNTY

No. *10396 1/2*

Julian Sayard

VS. } GARNISHMENT ON JUDGMENT

Thomas Rayburn
Garnishee:
Ala. State Dock

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Attorney