

MRS. CAMELLA HOOPER
d/b/a HOOPER BROTHERS

PLAINTIFF

VS

CHARLES BOYINGTON and
LUPE BOYINGTON

DEFENDANTS

* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

* AT LAW.

* CASE NO. 10,408

-1-

The Plaintiff claims of the Defendants ONE HUNDRED SIXTY (\$160.00) DOLLARS, the rent of a tract of land residence thereof to-wit one six room house at 105 Blackburn Avenue, Bay Minette, Alabama, demised by the Plaintiff to the Defendants on the 1st day of April, said rent commencing on the 1st day of April and ending on the 31st day of May.

Paul
\$120.00

ATTORNEY FOR PLAINTIFF

FILED

MAY 17 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,408

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Charles Boyington & Lupe Boyington

.....
.....
.....

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 Boyington & Lupe Boyington, Defendant.....

by Mrs. Camella Hooper d/b/a Hooper Brothers

..... Plaintiff.....

witness my hand this 17th day of May 19 72

Eunice B. Blackmon, Clerk

245-22-72

No. 10,408

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MRS. CAMELLA HOOVER d/b/a

HOOVER BROTHERS

Plaintiffs

VS.

CHARLES BOYINGTON & LUPE BOYINGTON

Defendants

SUMMONS AND COMPLAINT

Filed May 17 1972

Eunice B. Blackmon

Clerk

MAY 18 1972

FILED

C. L. Thompson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this May 22 1972

by leaving a copy with

Charles Boyington
Lupe Boyington

Sheriff claims miles of

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

Taylor Wilkins Sheriff

D. A. Zeller Deputy Sheriff

MRS. CAMELLA HOOPER,
d/b/a HOOPER BROTHERS,

Plaintiff,

vs.

CHARLES BOYINGTON and
LUPE BOYINGTON,

Defendants.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO: 10,408

PLEA

Come now the Defendants in the above styled cause separately and severally, by and through their attorneys of record, and make the following separate and several Pleas to said Complaint:

1. The allegations of the Complaint are untrue.
2. The Defendants, for answer to the Complaint, say that they have paid part of the debt for the recovery of which this suit was brought, before the action was commenced.

CHASON, STONE & CHASON

BY:

John E. Chason

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 23 day of May, 1972

John E. Chason

FILED

MAY 29 1972

EUNICE B. BLACKMON CIRCUIT CLERK

STATE OF ALABAMA

BALDWIN COUNTY

Before me, C. LeNoir Thompson, a Notary Public, in and for said State and County, personally appeared Mrs. Camella Hooper d/b/a Hooper Brothers, who being duly sworn deposes and says that she is the Plaintiff of this cause; that she has a just claim or demand against Charles Boyington and Lupe Boyington, and that this attachment is not sued out for the purpose of vexing or harassing the said defendants or for any other improper motive, and Defendants have property or monies liable to satisfy their debts which they fraudulently withhold.

Mrs. Camella Hooper-Hooper Brothers
MRS. CAMELLA HOOPER d/b/a
HOOPER BROTHERS

Sworn to and subscribed before me on this this the

17 day of May, 1972.

C. LeNoir Thompson
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

FILED

MAY 17 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, Mrs. Camella Hooper d/b/aHooper Brothers

....., of the County of Baldwin

are held and firmly bound unto Charles Boyington and Lupe Boyington

in the sum of Three Hundred Twenty (\$320.00) - - - - - Dollars, to
be paid to the said Charles Boyington and Lupe Boyington
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 Mrs. Camella Hooper d/b/a Hooper Brothers

..... have, on the day of the date
hereof, prayed an Attachment at the suit of Mrs. Camella Hooper d/b/a Hooper Brothers

..... against the estate of above named
Charles Boyington and Lupe Boyington

for the sum of One Hundred Sixty (\$160.00) - - - - - Dollars,
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said Mrs. Camella Hooper d/b/a Hooper Brothers

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.

Mrs. Camella Hooper (Seal)
William J. Hooper (Seal)
Brenda Marie (Seal)
..... (Seal)

Approved, this 17 day of May, 1972Ernie D. Blackmon Clerk

THE STATE OF ALABAMA,
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Mrs. Camella Hooper d/b/a Hooper Brothers

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

Charles and Lupe Boyington

is justly indebted to the Plaintiff Mrs. Camella Hooper d/b/a Hooper Brothers

in the sum of \$160.00 Dollars, and

Mrs. Camella Hooper d/b/a Hooper Brothers 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 Charles Boyington and Lupe Boyington, which is located at 105 Blackburn Avenue, Bay Minette, Alabama (to-wit: furniture and an automobile).

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 17 day of May A. D., 19 22

Eunice B. Blackmon Clerk.

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

Received 18 day of May 1922
and on 22 day of May 1922
I served a copy of the within Attachment
on Charles Boyington
Super Boyington
By service on _____

TAYLOR WILKINS
W. A. Talcher

attached on 1965 Ford
4 dr tag 5-24010 Ser 57607200120
Vehicle stored at Ball Co. Jail

No. 10,408

ATTACHMENT

Mr. Camella Hooper
d/b/a Hooper Brothers

Vs. { ATTACHMENT

Charles + Lupe Boyington

Issued May 17, 1922
Moore Printing Co.

MAY 18 1972

@ Le Roy Thompson