

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 10,525

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LEE JACKSON

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.....

LEE JACKSON....., Defendant.....

by

THOMAS PONTIAC-GMC, INC., A CORPORATION....., Plaintiff.....

Witness my hand this 2nd day of Aug - 19 72

Ernie B. Blackman Clerk

9433

No. 10525

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

THOMAS PONTIAC - GMC, INC.
Plaintiffs

vs.
LEE JACKSON

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

..... Clerk
AUG 2 1972

EUNICE B. BLACKMON CIRCUIT CLERK

BAILEY & TAYLOR, FAIRHOPE, ALA.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at **MAY BE**
SERVED AT:
CAMPBELL CONSTRUCTION ENG.
INC., 1525 AZALEA ROAD, MOBILE
ALABAMA 36609

Received In Office
RECEIVED

..... 19.....
AUG 2 1972 Sheriff

I have executed this summons

this 19.....
by leaving a copy with

RECEIVED
SHERIFF
MOBILE COUNTY ALA.
AUG 3 9 12 AM '72
BY

EXECUTED
This day of 1972
by serving a copy of the within on
RAY D. BRIDGES, Sheriff
By **[Signature]** D.S.

..... Sheriff
..... Deputy Sheriff

THOMAS PONTIAC-GMC, INC., A
CORPORATION

PLAINTIFF,

VS.

LEE JACKSON,

DEFENDANT.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY,

ALABAMA

AT LAW

COUNT I.

THE PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF ONE THOUSAND SIX HUNDRED THIRTY TWO AND 50/100 (\$1,632.50) DOLLARS, DUE FROM HIM BY ACCOUNT STATED BETWEEN PLAINTIFF AND DEFENDANT ON, TO-WIT, JANUARY 14, 1972, WHICH SUM WITH INTEREST THEREON IS STILL UNPAID.

COUNT II.

THE PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF ONE THOUSAND SIX HUNDRED THIRTY TWO AND 50/100 (\$1,632.50) DOLLARS, DUE IT FOR MERCHANDISE, GOODS AND CHATTELS, SOLD BY THE PLAINTIFF ON , TO-WIT, THE 14TH DAY OF JANUARY, 1972, WHICH SUM OF MONEY, WITH INTEREST THEREON IS STILL UNPAID.

BAILEY & TAYLOR

BY: *[Signature]*

ATTORNEY FOR PLAINTIFF

FILED

AUG 2, 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

CASE NO: _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

THOMAS PONTIAC-GMC, INC.
A CORPORATION

PLAINTIFF

Vs.

LEE JACKSON

DEFENDANT

TO ANY SHERIFF OF THE STATE
OF ALABAMA:

DEFENDANT MAY BE SERVED AT:

HIS PLACE OF EMPLOYMENT

CAMPBELL CONSTRUCTION ENGINEERING INC.
1525 AZALEA ROAD
MOBILE, ALABAMA 36609



THOMAS PONTIAC-GMC, Inc.



Telephone 928-2171 • (Drawer C) 72 Fairhope Ave.
Fairhope, Alabama 36532

STATEMENT

Lee Jackson
c/o Campbell Const. Engineering, Inc.
P.O. Box 9092
Mobile, Alabama 36609

1969 Pontiac used Bonneville 4 Door Hardtop, SERIAL #262399R151693

BALANCE DUE: \$1,632.50

STATE of ALABAMA
COUNTY of BALDWIN

Before me personally appeared Charles Mallory, who being first duly sworn, states that he is the Sales Manager of Thomas Pontiac-GMC, Inc., a Corporation; that he is personally acquainted with the above itemized account and that the same is true and correct that the balance due remains unpaid: that there are no set off or counter claims due against the same.

THOMAS PONTIAC-GMC, Inc.

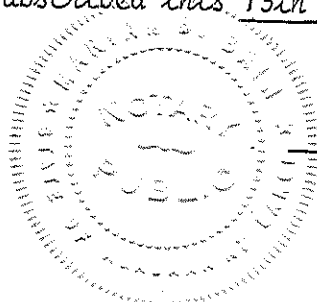
by Charles Mallory
Charles Mallory

Sworn to and subscribed this 13th day of March, 1973.

FILED

MAR 16 1973

EUNICE B. BLACKMON CIRCUIT
CLERK



Marion B. Bain
Marion B. Bain

My Commission Expires July 31, 1975

• Leasing

• Sales

• Parts

• Service

STATE OF ALABAMA

Baldwin County

TO LEE JACKSON Defendant.....;

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

..... THOMAS PONTIAC-GMC, INC. A CORP. Plaintiff.....versus LEE JACKSON Defendant.....

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

..... CAMPBELL CONSTRUCTION ENGINEERS, INC.

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

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

..... 31st day of July 19 73

DEFENDANT MAY BE SERVED AT:
1525 AZALEA RD.
MOBILE, ALABAMA 36609

Ernest B. Blackmer
Clerk of the Circuit Court.

REC'D. SHERIFF, DEPT.
MOBILE COUNTY, ALA.

AUG 2 9 43 AM '73

BY _____

10084

10,525-2

GR

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

THOMAS PONTIAC-GMC, INC. A
CORP.

Plaintiff....

8-3-73 vs.

LEE JACKSON

DEFENDANT MAY BE Defendant....
SERVED AT: 1525 AZALEA RD.
MOBILE, ALABAMA
36609

EXECUTED

This 3 day of August, 19 73
by serving a copy of the within on,

Lee Jackson

RAY D. BRIDGES, Sheriff

By J. Jackson D.S.

STATE OF ALABAMA
Baldwin County

Circuit Court

10,525¹/₂

Personally appeared before me, Eunice B. Blackmon. Clerk of the Circuit Court in and for Baldwin County and State aforesaid LLOYD E. TAYLOR, ATTORNEY AT LAW

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

of the Circuit Court of Baldwin County, to-wit: on the 16TH day of MARCH

19 73. THOMAS PONTIAC GMC.-INC. A CORP.

recovered a judgment against LEE JACKSON

..... for the sum of
(\$1,730.00) ONE THOUSAND SEVEN HUNDRED THIRTY AND NO/100----- Dollars

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

CAMPBELL CONSTRUCTION ENGINEERS, INC. 1525 AZALEA RD.
MOBILE, ALABAMA 36609

supposed to be indebted to or have effects of the said LEE JACKSON

in ITS possession, or under ITS Control, and that he believes process of

Garnishment against said CAMPBELL CONSTRUCTION ENGINEERS, INC.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 31

day of July A. D. 19 73

Eunice B. Blackmon

Clerk.

Lloyd E Taylor

NO.10,525.....

Circuit Court

THOMAS PONTIAC GMC, INC. A
CORP.

vs.

LEE JACKSON

AFFIDAVIT
GARNISHMENT ON JUDGMENT

Filed this day of

....., 19..73.

.....
Clerk

Moore Printing Co. — Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court

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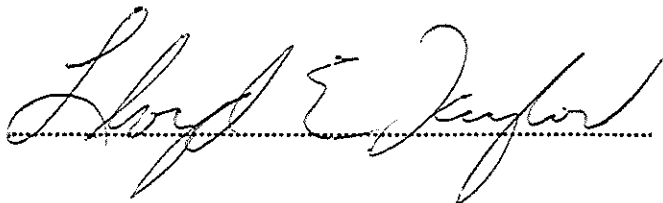
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is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this
day of A. D. 19 73

Clerk.



NO. 10,525

Circuit Court

THOMAS PONTIAC GMC, INC. A
CORP.

vs.

LEE JACKSON

**AFFIDAVIT
GARNISHMENT ON JUDGMENT**

Filed this day of

19 73

Clerk

Moore Printing Co. — Bay Minette, Ala.

Bay Minette, Ala.,

1972

To the Sheriff of Mobile County, Mobile, Alabama

I enclose herewith a LxC for service on
Lee Jackson, Co Campbell Const.
Co. Eng. 1525 Ozard Rd. Mobile.
Sparks!

Please serve and return as early as possible.

Sheriff, Baldwin County, Alabama

(If not found in your county, please advise promptly giving information as to present location if possible)