

ROBERT S. GILL, doing business as
Gill Printing and Stationery Co.,

Plaintiff,

VS.

ALBERT F. MARSH,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

2427

STATE OF ALABAMA)

*

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

Whereas Robert S. Gill, doing business as Gill Printing and Stationery Company has complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that Albert F. Marsh is justly indebted to him in the amount of \$631.15 and the said Robert S. Gill having made affidavit as required by law in such cases: You are hereby commanded to attach so much of the Estate of said Albert F. Marsh as will be of value to satisfy the said debt and costs, according to the complaint; and such estate, unless replevied so to secure that the same may be liable to future proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, Alabama, to be held at the Courthouse thereof, when and where you must make known how you have executed this writ.

Witness my hand this 29 day of Oct, 1954.

Alice J. Duck

Clerk

The Defendant being a non-resident of the State of Alabama, no bond is required of the Plaintiff. Dated this 29 day of Oct, 1954.

Alice J. Duck

Clerk

STATE OF ALABAMA)
 *
 MOBILE COUNTY)

Before me, the undersigned authority, personally appeared Robert S. Gill who first being duly and legally sworn deposes and says:

That he is the Plaintiff in the case of Robert S. Gill, doing business as Gill Printing and Stationery Company, Plaintiff vs. Albert F. Marsh; that he has a just claim or demand against the Defendant, Albert F. Marsh; that the said Albert F. Marsh, the Defendant in said cause is a non-resident of the State of Alabama, and that this attachment is not sued out for the purpose of vexing or harassing the said Defendant or for any other improper motive.

x Robert S. Gill

Sworn to and subscribed before me on this the 23rd day of October, 1954.

M. J. Culpepper

Notary Public, Mobile County, Alabama.

Notary Public, Mobile County, Alabama.
 My commission expires Sept. 17, 1957.
 Bonded by American Surety Co. of N. Y.

FILED

OCT 29 1954

ALICE J. DUCK, *clerk*

Notice of Levy on Real Estate

BOOK 004 PAGE 134

Robert S. Gill, d/b/a Gill
Printing & Stationery Company

Plaintiff,

vs.

Baldwin County Circuit Court

Albert F. Marsh

Defendant

To W. R. Stuart Judge of Probate, Baldwin County, Alabama:

Notice is hereby given that under a Writ of Attachment

issued in favor of the Plaintiff in above entitled cause, I have levied on the following described property of said Defendants, described as follows, viz :

S¹/₂ of SW¹/₄ of NW¹/₄ Sec. 33, T 8s, R 4e

STATE OF ALABAMA, BALDWIN COUNTY

Filed 11-4-54 109 M

Recorded 11-4-54 book 4 page 134

W. R. Stuart

Judge of Probate

EX

The above described Real Estate being in Baldwin County, Alabama.

Given under my hand this 4th day of November 19 54

Jayles Wilkins
Sheriff of Baldwin County, Alabama

ROBERT S. GILL, doing business as
Gill Printing and Stationery Co.,

Plaintiff,

VS.

ALBERT F. MARSH,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

STATE OF ALABAMA)

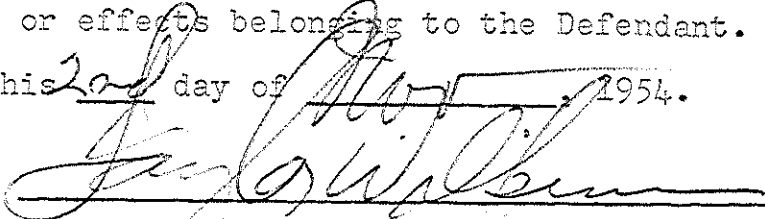
BALDWIN COUNTY)

TO ARTHUR E. WHELAN:

Whereas a suit has been commenced by writ of attachment in the Circuit Court of Baldwin County wherein Robert S. Gill, doing business as Gill Printing and Stationery Company, is Plaintiff and Albert F. Marsh, is Defendant, for the sum of \$631.15, which writ of attachment has been placed in my hands for due execution thereof.

These are, therefore to command you, that you personally be and appear before the judge in said Court at the present session thereof to be held for said County, then and there to answer on oath, within 30 days after the service of this writ, what you are indebted to said Defendant at the time of the service of this writ of garnishment, or may be indebted at the time of making your answer or at any time intervening the time of service of this garnishment and the time of making such answer and whether you will not be indebted in the future to him by a contract now existing and whether by contract now or then existing you are liable to said Defendant 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 whether you have not in the possession, or under your control money or effects belonging to the Defendant.

Witness my hand this 2nd day of May, 1954.


Sheriff of Baldwin County, Alabama

ROBERT S. GILL, doing business as
Gill Printing and Stationery Co.,
Plaintiff,
VS.
ALBERT F. MARSH,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Whereas, the Plaintiff in the above stated cause sued out in said Court a writ of attachment against the estate of Defendant Albert F. Marsh; and, whereas, said writ of attachment was executed by the Sheriff of Baldwin County, Alabama, on the 4th day of Nov, 1954, by serving a Sheriff's garnishment on the garnishee, Arthur E. Whelan; and,

Whereas, the said Defendant is a non-resident of the State of Alabama and resides at 631-26th Street, St. Petersburg, Florida; now, therefore, the said Defendant is hereby notified of the issuance of the said writ of attachment and the execution thereof, and to be and appear if he thinks proper to defend this suit at the present term of said Court and within 30 days after this notice by publication is completed.

Witness my hand this the 18th day of Nov, 1954.

Deice J. Hensley
Clerk

On the 19 day of Nov, 1954, a copy of the above notice was mailed to the Defendant at the above address.

On the 19 day of Nov, 1954, a copy of the above notice was delivered to the Baldwin Times, a newspaper, to be published once a week for 3 successive weeks.

Deice J. Hensley
Clerk

BOOK 003 PAGE 216

WITNESS my hand this _____ day of October, 1954.

Clerk

* * * * *

ROBERT S. GILL, doing business as
Gill Printing and Stationery Co.,

Plaintiff,

VS.

ALBERT F. MARSH,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-ONE AND 15/100 DOLLARS (\$631.15) due from him by account on the 1st day of May, 1953, which sum of money, with the interest thereon, is still unpaid. An itemized copy of the account sued on, verified by the affidavit of the Plaintiff, is hereto attached and made a part hereof.

FILED

Oct. 29, 5-4

ALICE I. DUCK, Clerk

Attorney for Plaintiff

STATE OF ALABAMA)
*
MOBILE COUNTY)

BOOK 003 PAGE 217

Before me, the undersigned authority, personally appeared Robert S. Gill who first being duly and legally sworn deposes and says:

That he is the Plaintiff in this cause and that he is acquainted with Albert F. Marsh the Defendant in said cause; that the said Defendant is a non-resident of the State of Alabama; that his residence and post office address is known and that the said residence and post office address of the said Defendant is 631 26th Street, St. Petersburg, Florida, and that the said Defendant is over the age of twenty-one years.

X Robert S. Gill

Sworn to and subscribed before me on this the 25th day of October, 1954.

J. J. Calhoun

FILED

Oct. 29, 54

Notary Public, Mobile County, Alabama.

Notary Public, Mobile County, Alabama.
My commission expires Sept. 17, 1957.
Bonded by American Surety Co. of N. Y.

Before me, the undersigned authority, personally appeared Robert S. Gill

known to me, who being duly sworn, upon his oath states that he is

of

a corporation organized and doing business under the laws of

a partnership composed of

a sole trader doing business as Gill Printing and Stationery Company

and that as such he makes this affidavit: that he is familiar with the books and business of said

Gill Printing and Stationery Company

that the attached account against Mr. Albert F. Marsh, Gulf Shores, Alabama

is just and correct, and within the personal knowledge of this affiant; that the items thereon stated and composing the

said account were sold and delivered to said Mr. Albert F. Marsh

at the special instance and request of said debtor, and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of

Six hundred thirty-one and 15/100 Dollars (\$ 631.15) with interest

from April 19 53, is justly due and remains unpaid.

Sworn to and subscribed before me on this the

6th day of August 19 54
W. A. Calpeper

Notary Public.

2427

COMPLAINT

ROBERT S. GILL, doing business as
Gill Printing and Stationery Co.

Plaintiff,

VS.

ALBERT F. MARSH,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 29 1954

elg
ALICE A. BARKER
BARKER

ATTORNEY AT LAW

BAY MINETTE, ALABAMA