

2502

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT . . LAW SIDE . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon William Grant to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the compalint of H. Kennedy.

WITNESS my hand this 4th day of January, 1955

Alice J. Duck
Clerk

- COMPLAINT -

H. KENNEDY,

Plaintiff,

-vs-

WILLIAM GRANT,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

- COUNT I -

The Plaintiff claims of the Defendant Four Hundred and Eight and 95/100 Dollars (\$408.95) due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant on the dates and in the amounts as shown by verified statement, which is attached hereto and specifically made a part hereof, which sum of money, with interest thereon, is still unpaid.

FILED
Jan. 4, 1955
ALICE J. DUCK, Clerk

Edison
Attorney for Plaintiff

In Account With
H. KENNEDY
Summerdale, Alabama

BOOK 003 PAGE 371

To: William Grant
Summerdale, Alabama

Date		Ticket Number	Debit	Credit	Balance
1952					
11-25	1 Gal Gro Crop	115958	\$ 3.00	\$	
1953					
2-2	6# Bahia .60	116829	3.60		
2-4	Check on Acct.			3.00	
2-9	40 Sx. Pontiac Potatoes (5.50)	116929	220.00		
2-10	87 Sx. 6-8-8 Bags Magn.				
	25 Sx. Pontiac Pots.	116995	232.24		
2-11	15 Sx. 6-8-8- B. Bags Magn.				
	17 Sx. N. Dok	117010	133.26		
2-12	Planting 5 Acres	117020	52.50		
2-14-	Advance on Potato Cutting - Ck. No. 19621		6.00		
2-24	Cutting Potatoes	117204	8.00		
3-7	Check on Acct.	117509	250.00	250.00	
3-11	35 Sx. 6-8-8-	117544	85.22		
	1 Sx. 6-8-8 Returned	117553		2.44	
3-16	5 Acres Sidedressed	117675	15.00		
4-2	6 Qt. Dithane, 8# Sinc				
	6 Qt. 33% DDT	118074	8.24		
4-20	7 Qt. Dithane, 2 Sx. Coposin, 10# Zinc	118560	8.87		
5-22	Advance Check #21491 to Ramirez - Picking up and Hauling Potatoes		123.15		
6-23	Credit for Potatoes	1630		368.15	
6-27	Digging working, etc.	1766	133.46		
			\$1032.54	\$623.59	

Balance Due:

\$408.95

STATE OF ALABAMA

BALDWIN COUNTY

Before me, FRANCES C. MALLORY a Notary Public
in and for said County in said State, personally appeared H.
Kennedy, who is known to me, and who, after being by me first
duly and legally sworn, deposes and says; That he is the owner

of the claim hereinabove set out; that the foregoing statement of account against William Grant is just, true and correct, and that there is now due on said account the sum of Four Hundred and Eight and 95/100 Dollars (\$408.95), after allowing all just credits and set-offs.

A. Kennedy

Sworn to and subscribed before
me on this the 30th day of
December, 1954.

FILED
Jan. 4, 1955
ALICE J. DUCK, Clerk

Frances G. Mallory
Notary Public, Baldwin County
State of Alabama

received 4 day of Jan 1955
id on 7 day of Jan 1955
served a copy of the within
William Grant
service on

TAYLOR WILKINS, Sheriff

By Elmer D. Tucker

~~I hope this 7th day
of Jan. 1955 attached,
per 2741 House Order
✓ Taylor Wilkins
Baldwin~~

1-7-55
2502

SUMMONS AND COMPLAINT

H. KENNEDY,
Plaintiff,

-VS-

WILLIAM GRANT,
Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

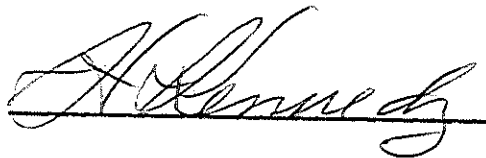
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FILED
JAN 12 1955
ALICE J. DUCK, Clerk
CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared H. Kennedy, who, being duly sworn, deposes and says:- That William Grant is justly indebted to the said H. Kennedy in the principal sum of Four Hundred and Eight and 95/100 Dollars (\$408.95), which said amount, with the interest thereon is justly due, and that the said William Grant is about to remove out of the State, and is about to remove his property out of the State, and that the Plaintiff will probably lose his debt and have to sue for it in another State, and that this attachment is not sued out for the purpose of vexing or harrassing the said Defendant.



FILED

Sworn to and subscribed before
me on this the 4 day of
June, 1955

ALICE J. DUCK, Clerk


Clerk

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MAN BY THESE PRESENTS:- That we, H. Kennedy as principal, and PAUL F. SCHULTZ, as surety, are held and firmly bound unto William Grant in the sum of One Thousand Dollars (\$1,000.00), to be paid to the said William Grant, his heirs, executors, administrators and assigns; for which payment, well and truly to be made, we bind ourselves, and each of us, and our and each of our heirs, executors and administrators, jointly and severally and firmly by these presents. Sealed with our seals, and dated, this 30th day of DECEMBER, in the year of our Lord, One Thousand Nine Hundred and Fifty-four.

The condition of the above obligation is such, That, Whereas, the above bound H. Kennedy has on the date hereof, prayed an attachment in his suit against the estate of the above named William Grant for the sum of Four Hundred and Eight and 95/100 Dollars (\$408.95), and has obtained the same, returnable to the present term of Circuit Court of Baldwin County, Alabama.

Now if the said Plaintiff shall prosecute his attachment to effect, and pay the Defendant all such costs and damages as he may sustain by reason of the wrongful or vexatious suing out of such attachment, then this obligation to be void, otherwise to remain in full force and effect.

H. Kennedy SEAL
As Principal

Paul F. Schultz SEAL
As Surety
Foley Sale

Approved this 4 day of January, 1955

FILED
Jan. 4, 1955
ALICE J. DUCK, Clerk

Alice J. Duck
Clerk

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, FRANCES G. MALLORY^a
Notary Public in and for said County in said State, H. Kennedy,
who, being duly sworn, deposes and says: That he is the Plaintiff
in that certain suit filed by him against William Grant in the
Circuit Court of Baldwin County, Alabama; that an attachment has
been requested in aid of said suit; that said suit is for an account
due to him by the said William Grant, as shown on a verified
statement of account made a part of the Summons and Complaint
filed against the said William Grant; that the said William Grant
has disposed of or is in the process of disposing of certain
properties owned by him in Baldwin County, Alabama, with the
avowed intention of removing himself and his property outside of
the State of Alabama; that upon the sale of this real estate owned
by the Defendant, which affiant has been informed and verily
believes, to have been consummated, Defendant William Grant will
have no property that is not easily moveable and transferrable
from one State to another.

H. Kennedy

Sworn to and subscribed before me,
a Notary Public, on this the 30th
day of December, 1954.

Frances G. Mallory
Notary Public, Baldwin County
State of Alabama

The above and foregoing affidavit, having been filed pursuant to the Code of Alabama of 1940, Title 7, Section 850, and based upon the specific facts and circumstances as set out in said affidavit, it is hereby CONSIDERED, ORDERED and ADJUDGED that an attachment be issued in favor of the Plaintiff against the Defendant in the sum of Four Hundred and Eight and 95/100 Dollars (\$408.95),

with interest thereon to the date of attachment, in accordance with a verified account filed in the Circuit Court of Baldwin County, Alabama, and that said sum is hereby fixed as the amount of said Sttachment.

DONE this the _____ day of _____, 1954.

Circuit Judge

STATE OF ALABAMA

BALDWIN COUNTY

BOOK 003 PAGE 374

TO ANY SHERIFF OF THE STATE OF ALABAMA, Greetings:-

WHEREAS, H. Kennedy has complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that William Grant is justly indebted to him in the sum of Four Hundred and Eight and 95/100 Dollars (\$408.95), with the interest thereon, and this sum having been fixed by the Judge of the Circuit Court of Baldwin County, Alabama, and that said H. Kennedy has made affidavit and given Bond as required by law in such cases, you are hereby commanded to attach so much of the estate of the said William Grant as will be of value to satisfy the said debt and Cost according to the complaint and such estate, unless replevied, so to secure the same, may be liable to further 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 the 4th day of Jan, 1954.

Alice J. Duck
Clerk

I have executed this writ of attachment this 7 day of Jan, 1955, by levying upon the following property in Baldwin County, Alabama, as the property of William Grant, the Defendant in said cause, to-wit:-

27 ft House Trailer

and hereby return this writ to the Court, this the 7 day of Jan, 1955.

FILED

Jan 4, 1955
ALICE J. DUCK, Clerk

Taylor Wilkins
Sheriff

Ellen Stenback

1-7-55

2502

Received 4 day of Jan 1955
and on 7 day of Jan 1955

I served a copy of the within
on William Grant

By service on _____

TAYLOR WILKINS, Sheriff
By Taylor Wilkins Sheriff

*I have this 7th
day of Jan. 1955
attached one 27 ft.
house trailer.*

*Taylor Wilkins
Sheriff*

WRIT OF ATTACHMENT

H. KENNEDY,
Plaintiff,

-VS-

WILLIAM GRANT,
Defendant.

(((((

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

(((((
FILED
JAN 4 1955
ALICE J. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA