

C. E. GARRETT,
Plaintiff

-vs-

BLANCHARD BOHANNAN and
BESSIE BOHANNAN,
Defendants

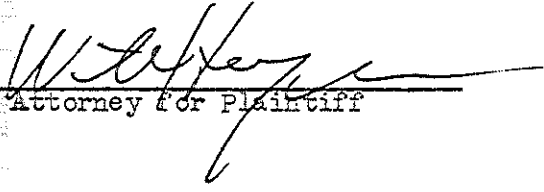
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 2606

Comes now the Plaintiff and denies Defendants' claim of set-off and says that the allegations contained therein are untrue.


Attorney for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

We, Blanchard Bohannon, and Dessie Bohannon, residents of Baldwin County, Alabama do hereby ~~and~~ make and file this ~~our~~ declaration in writing, under oath, that we have claimed and do hereby claim and set apart as being exempt from levy, seizure, or sale under execution or other process ~~from~~ the collection of debts, and in particular as exempt from attachment and sale all that particular property and household furniture attached in that particular suit wherein C. E. Garrett is Plaintiff and the undersigned are Defendants, now pending in Circuit Court, on Appeal from the Justice Court of Frank P. Propst. The undersigned also hereby claim all other exemptions allowed them under Alabama Law,

The undersigned hereby makes known to this Honorable Court that we do not own Real Estate valued at over \$2,000.00 or personal property valued at over \$1,000.00.

The undersigned also makes known that said Attached Property is the property of ~~the~~ sons and daughters and not the property of the undersigned, except the refrigerator.

Dated this 14th day of May, 1955. *his mark*

witnessed his mark

Evelyn Watts

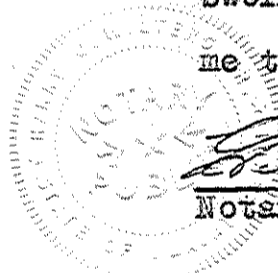
Blanchard Bohannon (X)

W. J. Watts

Dessie Bohannon

Sworn to and subscribed before
me this 24th day of May, 1955.

W. J. Watts
Notary Public, Baldwin County, Ala.



STATE OF ALABAMA

BALDWIN COUNTY

We, Blanchard Bohannon, and Dessie Bohannon, residents of Baldwin County, Alabama do hereby ~~xxx~~ make and file this ~~myr~~ declaration in writing, under oath, that we have claimed and do hereby claim and set apart as being exempt from levy, seizure, or sale under execution or other process ~~from~~ the collection of debts, and in particular as exempt from attachment and sale all that particular property and household furniture attached in that particular suit wherein C. E. Garrett is Plaintiff and the undersigned are Defendants, now pending in Circuit Court, on Appeal from the Justice Court of Frank P. Propst. The undersigned also hereby claim all other exemptions allowed them under Alabama Law,

The undersigned hereby makes known to this Honorable Court that we do not own Real Estate valued at over \$2,000.00 or personal property valued at over \$1,000.00.

The undersigned also makes known that said Attached Property is the property of ~~the~~ sons and daughters and not the property of the undersigned, except the refrigerator.

Dated this 14th day of May, 1955. *his mark*

Witnessed his mark
Ray J. Watts
Evelyn Watts

Blanchard Bohannon

Dessie Bohannon

Sworn to and subscribed before
me this 14th day of May, 1955.

Ray J. Watts

Notary Public, Baldwin County, Ala.



C. E. Garrett

Plaintiff

Vs

Blanchard Bohannan
and wife, Dessie Bohannan

Defendants

In the Justice Court of

Hon. Frank P. Propst

Beat 4

Now comes the Defendants in the above styled cause by their Attorney and claims all exemptions allowed them under Alabama Law against the amount sued for in said cause,

expressly
1 table, television set - 2 bedsteads, 4 bed mattresses,
7 chairs, 1 chifferony, 1 stove, 2 dressers, 1 settee,
1 dining room table, 1 ice box.
Lawrence T. McFarland
Attorney for the Defendants

THE STATE OF ALABAMA, }
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we Blanchard

Bohannon and wife - Jessie
Bohannon and Mrs. J. D. Payne

are held and firmly bound unto C. E. Garrett

in the sum of \$ 200⁰⁰ (Two hundred) DOLLARS

for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators, jointly and severally. And for the payment of the above bond; we waive our right of exemption to personal property under the Constitution and Law of the State of Alabama.

Sealed with our seals and dated this 4 day of May, 1955

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas a Writ of Attach-

ment issued by Hank P. Probst - Justice of the Peace

at the suit of said C. E. Garrett against the

estate of the above named Blanchard Bohannon and wife -

Jessie Bohannon returnable before the said Hank P. Probst

Peace, as aforesaid, at his office on the 10 day of May, 1955, for the

sum of \$ 200⁰⁰ - Two hundred DOLLARS,

has been placed in the hands of J. L. Barrow, Constable,

in and for the said County, and has been levied by him upon the following property, to-wit:

- Household furniture -
- (1) Table Television set
- (2) Bed Steaks
- (4) Bed Mattresses
- 7 Chairs
- 1 Chiffonbe
- 1 Stand
- 2 dressers
- 1 Settee
- 1 dining room table
- 1 Ice box

and whereas the property has been delivered to the said Blanchard Bohannon
and Wife - Jessie Bohannon on his entering into this bond.

NOW, THEREFORE, If the Defendant shall fail in said action, he or his securities shall return the specific property attached and above mentioned to the said Constable within ten days after judgment against said Defendant in this suit, then this obligation is to be void, otherwise to remain in full force and effect.

Taken and approved this 7
day of May, 1955

+ Blanchard Bohannon (L. S.)
Jessie Bohannon (L. S.)
Mrs. J. D. Payne (L. S.)
(L. S.)

G. E. Garrett

Plaintiff

Vs

Blanchard Bohannon
and wife, Dessie Bohannon

In the Justice Court of

Hon. Frank P. Propst

Beat 4

Defendants
Now comes the Defendants in the above styled cause by their Attorney and claims all exemptions allowed them under Alabama Law against the amount sued for in said cause, *especially*

1 table television set, 2 bedsteads, 4 bed mattresses, 7 chairs, 1 chiffonier, 1 stove, 2 presses, 1 settee, 1 dining room table, 1 chest box.

Arthur T. McKinley
Attorney for the Defendants

CIVIL SUBPOENA — ORIGINAL — In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Case No. 2606 March TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

1- James Jones

2- Cecil Hammond

You Are Hereby Comanded to Summon 3- Annie L. Stewart

4- Lamar Probst

5- Betty Phillips

if to be found in your County, at the instance of the Deft.

to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House

thereof, by 9:00 o'clock of the forenoon, on the 14th day of March, 1956, and from

day to day and term to term of said Court until discharged by law, then and there to testify, and the truth

to say, in a certain cause pending, wherein Garrith, Plaintiff and Bohannon

_____, Defendant.

Herein Fail Not, and have you then and there this Writ.

Given under my hand and seal, this 7 day of March, 1956.

Alida J. Husk Clerk.

ATTORNEYS	NAMES OF PARTIES	CAUSE OF ACTION	ITEMIZED BILL OF COST	
Wilson Hayes	C. E. Garrett vs	Attachment to Collect 100 ⁰⁰	Justice's Fees Issuing Summons to attachee \$ 50	50
Dorben F. McKinley	Blanchard Bohannon Wife Dessie Bohannon	due ferrent	Issuing Alias Summons 50 Issuing 4 Subpoenas for each witness 15 Issuing Execution and Taxing Cost 50 Issuing Summons to Garnishee and taking answer 50 Issuing Attachment Writ 50 Attachment Bond and Affidavit 1 50 Garnishment Bond and Affidavit 50 Appeal or Certiorari, including Bond 1 00 Bond 50 Administering Oath and certifying same 50 Certificate not otherwise provided for 25 Docketing Cause 10 Judgment on Forthcoming Stay or Replevin Bond 50 Judgment on Summary Proceeding 75 Issuing Venire Facias 50 Transcript of Proceeding 50 Attending Trial or Right of Property 1 00 Sci. Fa. or notice in nature thereof 50 Making Return of Certiorari 50 Notice to Defendant 15 Release 25	60 50 150 100 50 60 100 50 50 60 100
DISPOSITION OF CASE			CONSTABLE'S FEES Civil Cases	
Exemption filed and was denied	Bond and Affidavit Filed April 26-1955		Serving 4 Summons 1 00 Serving 4 Summons on each Witness 25 Serving Garnishment Attachment 25	100 100 25
	Summons and Complaint Issued Ret April 26-1955		Levying Execution under \$50.00 1 00 Levying Attachment under \$50.00 1 00	50 50
	May 10-55 Ret. Executed By J. L. Barrow		Making Money, 3 per cent. not less than 75 Serving Notice, etc. on each party therein 25 Serving Sci Fa. or other like Notices 50 Taking Bail or other Bond 50	75 25 50 50
	After hearing evidence judgement was rendered in favor of Plaintiff but 100 ⁰⁰ . Costs assessed defendant		Keeping Property Levied on 50 Witness Days 50 Garnishee's Fee	50 50 50
Case Appealed to Circuit Court - Jury Trial demanded - Supersedeas and Appeal Bond made and approved - Transcript sent Circuit Clerk May 11-1955				425

THE STATE OF ALABAMA, }
Baldwin County

IN THE JUSTICE COURT OF
FRANK P. PROPST

To Any Lawful Officer of said County, GREETINGS:

Summon Blanchard Bohannon & Wife, Dessie

to appear before me on the 30 day of April, 1955, next, at my office in Day Muelle Baldwin County, Alabama, to answer the complaint of C. E. Garrett

and then and there make a return of this summons.

Issued the 26 day of April, 1955

Frank P. Propst Justice of the Peace

COMPLAINT

C. E. Garrett
Plaintiff..

VS.

Blanchard Bohannon & Wife
Defendant..

The Plaintiff claims of the Defendant the sum of \$100.00 Dollars

due & unpaid on rent

- 1. Television
- 2. Bookshelves
- 1 Chiffonier
- 1 Chair
- 2 Dressers
- 1 Settee
- 1 Dining room Table
- 1 Ice Box
- 4. Bed mattress
- 7 chairs

C. E. Garrett Plaintiff's Attorney

THE STATE OF ALABAMA,
Baldwin County

KNOW ALL MEN BY THESE PRESENTS:

That we, *Blanchard Bohannon, Mrs. Dessie Bohannon*
are held and firmly bound unto *C. E. Garrett*
in the sum of *Two hundred* DOLLARS,
for the payment of which, well and truly to be made, we bind ourselves, and each of us, our and each of our
heirs, executors and administrators, jointly and severally. But upon condition, that if the above bound

Blanchard Bohannon and Mrs. Dessie Bohannon shall prosecute to effect an appeal by him taken this day
to the next term of the *Circuit* Court of *Baldwin County, Ala.* from a judgment
rendered against him in favor of said *C. E. Garrett*

by *Frank P. Probst*, a Justice of the Peace for said County, for the
sum of *One hundred dollars* and *claim of exemption by defendant* Dollars, debt
in said appeal, shall pay such judgment, both as to debt and costs as may be rendered against him by the
said *Baldwin County Circuit Court*, then in either
of said events, this obligation to be void, otherwise to remain in full force and effect.

Given under our hands and seals, this the *10th* day of *May* 19*55*

Approved:

Blanchard Bohannon (L. S.)

Mrs. Dessie Bohannon (L. S.)

Frank P. Probst J. P.

Mrs. L. D. Payne (L. S.)

THE STATE OF ALABAMA,
Baldwin County

Before me, Frank P. Probst a Justice of the Peace in and for
said County, personally appeared C. E. Garrett
who, being duly sworn, says that Blanchard Bohannon & Wife
justly indebted to him - C. E. Garrett
in the sum of \$100 DOLLARS,
after allowing all just offsets and discounts, and the said Blanchard Bohannon
and wife are moving - leaving the
account of \$100⁰⁰ for rent due &
unpaid!

and that this attachment is not sued out by him for the purpose of vexing or harassing the said Defendant.

Sworn to and subscribed before me this
26 day of April, 1953
Frank P. Probst J. P.

x C. E. Garrett

THE STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That we, C. E. Garrett

are held and firmly bound unto Blanchard Bohannon & Wife
in the sum of \$200⁰⁰ DOLLARS,
to be paid unto the said Blanchard Bohannon & Wife
heirs, executors, administrators or assigns, for which payment, well and truly to be made, we bind
ourselves and each of us, our heirs, executors, jointly and severally, firmly by these presents. And the
right of exemption under the Constitution and Laws of Alabama is hereby waived as to this Bond.

Sealed with our seals, and dated this 26 day of April, 1953

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas the above bound

C. E. Garrett
has on the day of the date hereof, prayed an Attachment at the suit of C. E. Garrett

in the sum of \$100⁰⁰ DOLLARS

and has obtained the same, returnable before me at my office, on the 30 day of April, 1953

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

Approved this 26 day of
April, 1953
Frank P. Probst J. P.

x C. E. Garrett (Seal)
____ (Seal)
____ (Seal)

THE STATE OF ALABAMA, }
 Baldwin County.

To the Sheriff or Any Constable of said County, Greetings:

Whereas, C. E. Garrett

hath complained to me, Frank P. Propst a Justice of the Peace in and for

said County, that Blanchard Behannon & Wife

is justly indebted to him - C. E. Garrett

in the sum of \$100⁰⁰ DOLLARS,

and the said C. E. Garrett

having made affidavit and given bond as required by law in such cases, You are Hereby Commanded, to attach so much of the goods, furniture and effects of said Blanchard Behannon & Wife as will be of value to satisfy said debt and cost, according to the Complaint, and such estate unless repleived, so to secure that the same may be liable to further proceeding thereon, to be had before me on the 30 day of April 1955, when and where you must make known how you have executed this Writ.

Witness my hand, this, the 26 day of April 1955 -

Frank P. Propst

J. P.

2606

State of Alabama
County of Baldwin

Circuit Court of Baldwin County,
May Term, 1955

We, Blanchard Bohannon, Dessie Bohannon and Mrs. J. D. Payne
are held and firmly bound unto C. E. Garrett in the
sum of \$ 200.00, for the payment of which well and
truly to be made, we and each of us do jointly and severally
bind ourselves, our heirs, executors and administrators, firmly
by these presents.

Sealed with our seals and dated this 10th day of May
1955.

The condition of the above obligation is such that whereas
at the 5/9/55 term of the J. P. Court of Frank P.
Propst, held in and for said county, judgment was rendered
against the above bound Blanchard Bohannon and Dessie Bohannon
in a cause therein pending styled C. E. Garrett Vs Blanchard
Bohannon and Dessie Bohannon for \$100.00 and costs of suit;
from which judgment the Defendants have applied for and obtained
an appeal to the Circuit Court of Baldwin County, Alabama and

Whereas it is desired to stay or suspend the execution of
such judgment until the final determination of said appeal:

Now if the said Blanchard Bohannon and Dessie Bohannon shall
prosecute said appeal to effect, or if he fails therein, shall
satisfy such judgment as the Circuit Court of Baldwin County,
Alabama shall render in the premises, then this obligation is
to be null and void, otherwise to be and remain in full force
and effect.

Mrs. Dessie Bohannon Seal
Mrs. J. D. Payne Seal
Blanchard Bohannon Seal

Taken and approved this the 11 day of May 1955

Frank P. Propst