

L.L. Malone and Nell A.  
Malone d/b/a Malone  
Pontiac Motors,

Plaintiffs

vs

James H. Gorham,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

2658

Plaintiffs claim of Defendant the sum of \$ 392<sup>00</sup>  
for work and labor done by the Plaintiffs, his agents or employees, on the  
28<sup>th</sup> day of June 1948 at his request.

And Plaintiffs further avers that the work and labor performed  
was upon a 1949 Oldsmobile 88 Sedan upon which Plaintiffs claim a lien as  
made and provided by Code of Alabama 1940, Sec. 25 et seq. 33 et seq.

Wilson Hayes  
Wilson Hayes  
Attorney for Plaintiffs

ATTACHMENT

The State of Alabama, {  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, L. L. Malone and Nell A. Malone, d/b/a Malone Pontiac Motors,  
plaintiff

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
James H. Goram, Defendant

is justly indebted to the Plaintiff L. L. Malone and Nell A. Malone, d/b/a Malone Pontiac  
Motors

in the sum of Three-hundred, ninety-two and no/100 Dollars, and

he, the said L. L. Malone 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  
James H. Goram, to-wit, one 1949 Oldsmobile 88 sedan,

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 12 day of July A. D., 1952.

Alice J. Duck Clerk.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2658

July 30 TERM, 19 55

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES H. GORHAM

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

JAMES H. GORHAM

Defendant

by

L. L. MALONE AND WILL A. MALONE d/b/a MALONE PONTIAC MOTORS, PLAINTIFF

Plaintiff

Witness my hand this 30th day of July 19 55

Alice J. Hester, Clerk

THE STATE OF ALABAMA }  
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, L. L. Malone and Nell A. Malone,  
d/b/a Malone Pontiac Motors,

....., of the County of Baldwin, State of Alabama

are held and firmly bound unto James H. Goram

in the sum of Seven-hundred, eighty-four and no/100 Dollars, to

be paid to the said James H. Goram

heirs, executors, administrators, or assigns, for which payment, 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, firmly by these presents.

Sealed with our seals and dated the 12 day of July, 1955

The Condition of this Obligation is such:

That whereas, the above bounden L. L. Malone and Nell A. Malone, d/b/a Malone  
Pontiac Motors has, on the day of the date  
hereof, prayed an Attachment at the suit of L. L. Malone and Nell A. Malone, d/b/a Malone  
Pontiac Motors against the estate of above named  
James H. Goram

for the sum of Three-hundred and ninety-two and no/100 Dollars,  
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said L. L. Malone and Nell A. Malone, d/b/a Malone Pontiac Motors  
should prosecute said Attachment to effect, and pay the said Defendant all such damages as he  
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.

L. L. Malone for Malone Pontiac Motors (Seal)

..... (Seal)

..... (Seal)

..... (Seal)

Approved, this 12<sup>th</sup> day of July, 1955

Archie J. Smith Clerk