

THOMAS MEEKS and ERNEST
P. MEEKS,

Plaintiffs,

-vs-

ROBERT LEE PARKER,

Defendant.

) IN THE CIRCUIT COURT

(OF BALDWIN COUNTY,

(ALABAMA.

(AT LAW.

) CASE NO. 2675-

COUNT ONE

Plaintiffs claim of the Defendant the sum of Three Hundred (\$300.00) Dollars as damages, in this that heretofore on to-wit: the 24th day of April, 1955, the Defendant so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.

Gordon R. Garsen

ATTORNEYS FOR PLAINTIFFS

STATE OF ALABAMA)
(
COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert Lee Parker to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of Thomas Meeks and Ernest P. Meeks.

Witness: Alice J. Duck, Clerk of said Court, this 23rd day of July, 1955.

Attest: Alice J. Duck
CLERK

* * * * *

SHERIFF'S RETURN

Received _____ day of _____, 1955, and on the _____ day of _____, 1955, I served a copy of the within complaint on Robert Lee Parker by service on _____.

SHERIFF

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

July 22, 1955

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose herewith original and copy of complaint which we wish to file in your court.

Please acknowledge receipt of this suit, and let us know when service of process has been accomplished on the defendant.

Very truly yours,

GORDON & JANSEN

BY: 

VRJjr/pjb
Encl. 1

GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.
OF COUNSEL:
ROBERT E. GORDON
1325 DAUPHIN STREET

April 12, 1956

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

RE: Case No. 2675 - Thomas Meeks and Ernest Meeks
vs. Robert Lee Parker

Dear Mrs. Duck:

We are enclosing herewith original of garnishment affidavit, together with notice to the Defendant and garnishee, which we wish to file in the above styled cause.

We have followed the form ordinarily used in this County, and if there is anything further which you may need, please let us know.

Very truly yours,

GORDON & JANSEN

BY 

pjb
Encls.

THOMAS MEEKS & ERNEST P. MEEKS

VS

ROBERT LEE PARKER
(H.H. ROBERTSON, GARNISHEE)

*

*

*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 2675 $\frac{1}{2}$

Comes H. H. ROBERTSON and for answer in above style cause says that ROBERT LEE PARKER, is not employed by him and he does not have any money belonging to or expect to have any belonging to said Robert Lee Parker.

H. H. Robertson

WITNESSES:

Robert Henderson

Myford Lamon

THOMAS P. MEEKS and
ERNEST MEEKS,

Plaintiffs,

-vs-

ROBERT LEE PARKER,

Defendant.

) IN THE CIRCUIT COURT

) OF BALDWIN COUNTY,

) ALABAMA.

) AT LAW.

) CASE NO. 2675

NOTICE TO DEFENDANT

Take notice that I have this day issued a Writ of Garnishment summoning H. H. Robertson, Bay Minette, Alabama, to appear before the Circuit Court of Baldwin County, on the within day of 30 days 1956, at _____ o'clock, to answer on oath as Garnishee, whether he is indebted to you or not.

Given under my hand and seal, this 16 day of April, 1956.

Archie D. Duck
CLERK OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA)
COUNTY OF BALDWIN)

CIRCUIT COURT

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA.

You are hereby commanded to serve a copy of the attached notice
on Robert Lee Parker.

Dated, this 16 day of April, 1956.

W. J. Smith

CLERK OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA.

SHERIFF'S RETURN

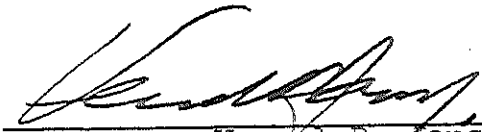
Received _____ day of _____, 1956, and on the _____
day of _____, 1956, I served a copy of the within notice
on Robert Lee Parker by service on _____.

SHERIFF

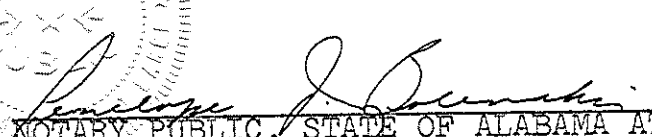
STATE OF ALABAMA }
COUNTY OF BALDWIN }

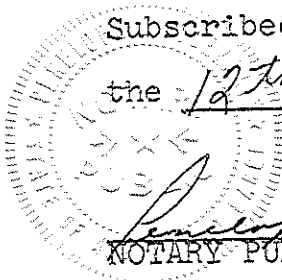
C I R C U I T C O U R T

Personally appeared before me, Penelope J. Bolerakis, a Notary Public in and for the State of Alabama at Large, Vernol R. Jansen, Jr., who being duly sworn, on oath says that on the _____ day of December, 1955, of the Circuit Court of Baldwin County, Thomas Meeks and Ernest P. Meeks recovered a judgment against Robert Lee Parker for the sum of Two Hundred (\$200.00) Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect; that H. H. Robertson, Bay Minette, Alabama, is supposed to be indebted to or have effects of the said Robert Lee Parker in his possession, or under his control, and that he believes process of garnishment against said H. H. Robertson, as the Employer of Robert Lee Parker, is necessary to obtain satisfaction of said judgment.


Vernol R. Jansen, Jr.

Subscribed and sworn to before me on this
the 12th day of April, 1956.


NOTARY PUBLIC, STATE OF ALABAMA AT LARGE.



STATE OF ALABAMA)
BALDWIN COUNTY {

TO THE SHERIFF OF BALDWIN COUNTY — GREETINGS:

You are commanded to summon H. H. Robertson, Bay Minette, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, at the Court House of Baldwin County, on the 15 day of May, 1956, at the hour of 9.00 o'clock, to answer on oath as Garnishee whether or not he is indebted to Robert Lee Parker, at the time of service of this Garnishment, or at the time of making said answer, or at any time intervening the service of this Garnishment and making the answer, or whether he will be indebted in the future to said Robert Lee Parker by a contract existing at the time of the serving of this garnishment, or at the time of making the answer, and if indebted, what amount, and whether he has in his possession, or under his control any personal or real property, or things in action belonging to said Robert Lee Parker. Herein fail not, and have you then and there this Writ, with your actions and doings therein.

Witness my hand and seal, this 16 day of April, 1956.

David J. [Signature]
CLERK OF THE CIRCUIT COURT
OF BALDWIN COUNTY

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SHERIFF'S RETURN

Received _____ day of _____, 1956, and on the _____ day of _____, 1956, I served a copy of the within Writ on H. H. Robertson by service on _____.

SHERIFF