

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Paul Robert Tuveson

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

Paul Robert Tuveson

, Defendant

by Gordon G. Kerr and Robert E. McAllister d/b/a Metal Fabricating Company

, Plaintiff

Witness my hand this 27th day of July

1955

Alice J. Burke, Clerk

ATTACHMENT

The State of Alabama, {
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, GORDON G. KERR

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

PAUL ROBERT TUVESON

is justly indebted to the Plaintiff GORDON G. KERR

in the sum of Two Thousand Nine Hundred Eighteen and 87/100 (\$2918.87) Dollars, and

Gordon G. Kerr 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

Paul Robert Tuveson

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 within thirty (30) days 1955
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 27th. day of July A. D., 1955.

Alice J. Duck Clerk.

State of Alabama---Mobile County

CIRCUIT COURT, OCTOBER TERM 19.....

GORDON G. KERR & ROBERT E.
MCALLISTER, doing business as
METAL FABRICATING CO

Plaintiffs

vs.

PAUL ROBERT TUVESON

Defendant.

Mobile, Ala., December 5 19 55

Chris C. Delaney appears for

Paul Robert Tuveson Defendants

in the above entitled cause and reserve the right to demur or plead specially.

Chris C. Delaney
Defendant demands a trial by jury
Chris C. Delaney
Attorney for

BOOK 004 PAGE 203

Notice of Levy on Real Estate

Gordon G. Kerr and
Robert E. McAllister.....Plaintiff,

vs.

Baldwin County Circuit Court

Paul Robert Tuveson.....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:

Lot 10 in Block 3, Magnolia Beach Addition to the
town of Fairhope, according to Plat thereof recorded
in miscellaneous Book 1, Page 331, Baldwin County,
Alabama, Probate Court Records

STATE OF ALABAMA, BALDWIN COUNTY
8: A.M.
7-28-55
Filed
Recorded Lie. Clerk Book 4 page 203
W. R. Stuart
Judge of Probate

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

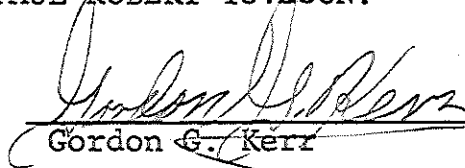
Given under my hand this 28th day of July 19 55

Lylos Wilkins
Sheriff of Baldwin County, Alabama

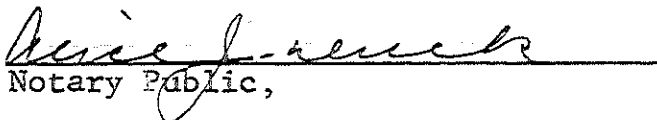
STATE OF ALABAMA

COUNTY OF BALDWIN

Personally appeared before me, ALICE J. DUCK, Clerk of the Circuit Court of said county, GORDON G. KERR, who makes oath and says that PAUL ROBERT TUVESON is justly indebted to GORDON G. KERR and ROBERT E. MCALLISTER doing business as METAL FABRICATING COMPANY in the sum of TWO THOUSAND NINE HUNDRED EIGHTEEN AND 87/100 (\$2918.87) DOLLARS, and that the said PAUL ROBERT TUVESON is about to fraudulently dispose of his property so that the plaintiffs will probably lose their debt, and that this attachment is not sued out for the purpose of vexing or harassing the defendant, PAUL ROBERT TUVESON.


Gordon G. Kerr

Subscribed and sworn to before
me on this 27th day of July, 1955.


Notary Public,

STATE OF ALABAMA

COUNTY OF BALDWIN

KNOW ALL MEN BY THESE PRESENTS, that we, GORDON G. KERR and
AMERICAN CASUALTY COMPANY
OF READING, PENNSYLVANIA

of the County of Baldwin are held and firmly bound unto PAUL ROBERT TUVESON in the sum of FIVE THOUSAND EIGHT HUNDRED THIRTY-SEVEN AND 74/100 (\$5837.74) DOLLARS to be paid to the said PAUL ROBERT TUVESON his certain attorneys, executors, administrators and assigns, for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators, jointly and severally firmly by these presents. Sealed with our seals, and dated the 27th day of July, 1955.

THE CONDITIONS OF THE ABOVE OBLIGATION is such, that WHEREAS

the above bounden GORDON G. KERR has the day of the date hereof, before the Clerk of the Circuit Court of Baldwin County, Alabama, prayed an attachment at the suit of GORDON G. KERR and ROBERT A. MCALLISTER doing business as METAL FABRICATING COMPANY against the estate of the above named PAUL ROBERT TUVESON for the sum of TWO THOUSAND NINE HUNDRED EIGHTEEN AND 87/100 (\$2918.87) DOLLARS and hath obtained the same returnable to the present term of the Circuit Court of Baldwin County.

NOW, if the said GORDON G. KERR and ROBERT E. MCALLISTER, doing business as METAL FABRICATING COMPANY shall prosecute PAUL ROBERT TUVESON and said attachment to execute, and pay to the said PAUL ROBERT TUVESON all such damages as he may sustain by the wrongful or vexatious suing out thereof, then the above obligation to void; otherwise, to remain in full force and effect.

METAL FABRICATING COMPANY

BY:

Gordon G. Kerr, Partner

AMERICAN CASUALTY COMPANY
OF READING, PENNSYLVANIA

Attorney in Fact
ATTORNEY IN FACT

CERTIFIED COPY



NO. 5722

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That the AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, a Pennsylvania Corporation, having its principal office in the City of Reading, County of Berks, Commonwealth of Pennsylvania, pursuant to the following By-Law, adopted by the stockholders of the said Company on November 21st, 1950, to wit:

"Article VI—Section 2. Powers of Attorney—The President, or any Vice President shall have power and authority to appoint Attorneys-in-Fact, and to authorize them to execute on the behalf of the Company and attach the seal of the Company thereto, bonds and undertakings, recognizances, contracts of indemnity and other written obligatory in the nature thereof, and they may, at any time, revoke the authority of any such Attorneys-in-Fact."

does hereby constitute and appoint J. P. COURTNEY, JR., of
Mobile, Alabama

its true and lawful attorney(s)-in-fact, to execute, seal and deliver for and on its behalf as surety, any and all bonds and undertakings, recognizances, contracts of indemnity and other writings obligatory in the nature thereof, which are or may be allowed, required or permitted by law, statute, rule, regulation, contract or otherwise, provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed ONE HUNDRED FIFTY THOUSAND AND NO/100 (\$150,000.00) DOLLARS

and the execution of such instrument(s) in pursuance of these presents, shall be as binding upon the said AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, as fully and amply, to all intents and purposes, as if the same had been duly executed and acknowledged by its regularly elected officers at its principal office.

ALL AUTHORITY HEREBY CONFERRED SHALL EXPIRE AND TERMINATE WITHOUT NOTICE AT MIDNIGHT OF 10-6-55

IN WITNESS WHEREOF, the AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA has caused these presents to be signed and its corporate seal to be affixed by its authorized officer this 2nd day of August, 19 54

(CORPORATE SEAL)

F. O. BEATTIE

Vice-President

COMMONWEALTH OF PENNSYLVANIA,
COUNTY OF BERKS,

SS:

On this 2nd day of August, 19 54, before me came the individual, to me personally known, who executed the preceding instrument, and being by me duly sworn, said that he is the therein described and authorized officer of the AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA; that the seal affixed to said instrument is the corporate seal of said Company, and the said corporate seal and his signature were duly affixed by the authority and direction of the said Corporation, and that Article VI, Section 2, of the By-Laws, of said Company, referred to in the preceding instrument, is now in force.

IN WITNESS WHEREOF, I have hereunto set my hand, and annexed my official seal at the City of Reading, the day and year first above written.

My commission expires March 23rd, 19 57

R. C. Pahl

Notary Public.

COMMONWEALTH OF PENNSYLVANIA,
COUNTY OF BERKS,

SS:

(NOTARIAL SEAL AFFIXED)

J. W. Books, Assistant Secretary of the AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, do hereby certify that the foregoing is a true and correct copy of Power of Attorney issued by said American Casualty Company of Reading, Pennsylvania, and that I have compared same with the ORIGINAL on file in the Home Office of said Company, and that it is a correct transcript thereof and of the whole of the said original, and that the said Power of Attorney has not been revoked and is now in full force and effect.

IN WITNESS WHEREOF, I have hereunto subscribed my name as Assistant Secretary, and affixed the corporate seal of the Company at the City of Reading, Pennsylvania, this 27th day of July, 19 55

J. W. Books
Assistant Secretary.

2682



RECORDED

BOND

No.

on Behalf of

in Favor of

GORDON G. KERR and ROBERT E.
MCALLISTER, doing business as
METAL FABRICATING COMPANY,

Plaintiffs,

Vs.

PAUL ROBERT TUVESON,

Defendant.

*

*

*

*

*

*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

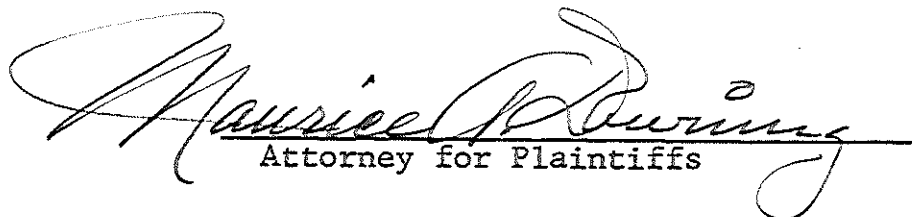
NO. _____

COUNT ONE

The plaintiffs claim of the defendant, the sum of TWO THOUSAND NINE HUNDRED EIGHTEEN AND 87/100 (\$2918.87) DOLLARS due from him by account on the 6th day of May, 1955, which sum with interest, is still due and unpaid.

COUNT TWO

The plaintiffs claim of the defendant, the sum of TWO THOUSAND NINE HUNDRED EIGHTEEN AND 87/100 (\$2918.87) DOLLARS due from him by account stated between the plaintiffs and the defendant from the 6th day of May, 1955, which sum of money with interest thereon is still due and unpaid.


Attorney for Plaintiffs

Defendant's Address:

Paul Robert Tuveson
Pier Street
Fairhope, Alabama

ATTACHMENT

The State of Alabama, {
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS,

GORDON G. KERR

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

PAUL ROBERT TUVESON

is justly indebted to the Plaintiff

GORDON G. KERR

et al

in the sum of Two Thousand Nine Hundred Eighteen and 87/100 (\$2918.87)-- Dollars, and

Gordon G. Kerr

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

Paul Robert Tuveson

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 within thirty (30) days 19

next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 27th. day of July A. D., 1955.

Alice J. Duck Clerk.

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 2682

TERM, 19--

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Paul Robert Tuveson

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

Paul Robert Tuveson, Defendant.

by Gordon G. Kerr and Robert E. McAllister a/b/a Metal Fabricating Company

Plaintiff.

Witness my hand this 27th day of July 19 55

Clerk

Notice of Levy on Real Estate

Gordon G. Kerr and
Robert E. McAllister-----Plaintiff,

vs.

Baldwin County Circuit Court

Paul Robert Tuveson-----Defendant

To H. 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 :

Lot 10 in Block 3, Magnolia Beach Addition to the
town of Fairhope, according to Plat thereof recorded
in miscellaneous Book 1, Page 331, Baldwin County,
Alabama, Probate Court Records

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

Given under my hand this 28th day of

July 19 55

Taylor Wilkin
Sheriff of Baldwin County, Alabama

IN THE CIRCUIT COURT OF BALDWIN
COUNTY ALABAMA

AT LAW NO. 2682

Witness my hand this 7th day of December 1955.

Reed Luck
Clerk, Circuit Court, Baldwin County, Alabama

EVELYN HANAK,	§	
Plaintiff,	§	IN THE CIRCUIT COURT OF
vs.	§	BALDWIN COUNTY, ALABAMA
GEORGE I. HULL,	§	AT LAW. NO. 2682
Defendant.	§	

Comes now the Defendant in the above styled cause, by his attorneys, and for answer to the Complaint as amended heretofore filed against him, pleads as follows:

1. Not guilty.

2. For further answer to the Complaint, the Defendant alleges that the Plaintiff was herself guilty of negligence at the time and place alleged in the amended Complaint, which proximately contributed to her alleged injuries and damages in that she so negligently operated her said motor vehicle at said time and place so as to cause and allow the same to run into, upon and against the automobile of the Defendant, thereby proximately contributing to her own alleged injuries and damages, and hence she should not recover in this suit.

CHASON & STONE

By:


Attorneys for Defendant.

EVELYN HANAK,
Plaintiff,

vs.

GEORGE I. HULL,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 2682

PLEAS

FILED

JAN 24 1956

ALICE L. DICK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

2850