

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3234.

CHESTER A. STAPLETON AND
ROYAL H. STAPLETON,

PLAINTIFFS

VS.

JAMES B. CRABTREE

DEFENDANT

SUMMONS AND COMPLAINT

FILED
MAY 3 1957
ALICE A. BUCK, CLERK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

Not found in my county after diligent search and
Returned 8 day of May 1957
BY Staylor Williams, Sheriff
Deputy Sheriff

JIMMY FAULKNER
AND
BILL STEWART
PUBLISHERS

3236

THE BALDWIN TIMES

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

E. R. MORRISSETTE, JR.
EDITOR-MANAGER

Legal Notice

Attachment Notice
STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,
May Term, 1957.

Chester A. Stapleton and Royal
H. Stapleton Plaintiffs vs. James
B. Crabtree, Defendants.

WHEREAS, Chester A. Stapleton and Royal H. Stapleton as Plaintiffs in said cause, has obtained an Attachment out of this Court, issued the 3rd day of May, 1957, against the estate of the said defendant James B. Crabtree which Attachment has been levied upon the following described real estate as the property of the said defendant, to-wit:

$\frac{1}{2}$ undivided interest in and to real property in Baldwin County, Alabama, in original section 37, T. 8 S., R. 5 E., described as being Lot 110 of Bear Point Estates, a subdivision, Map Book 4, p. 103, of the records of the Judge of Probate of Baldwin County, Alabama. and whereas, it appears that the said James B. Crabtree, Defendant aforesaid is a non-resident of the State of Alabama and resides in Pensacola, Fla.

NOW THEREFORE, the said James B. Crabtree wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 23rd day of May, 1957.

ALICE J. DUCK,
Clerk.

J. Connor Owens,
Solicitor for Plaintiff.

20-3tc.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

E. R. Morrisette, Jr. being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

vs. Stapleton vs. Crabtree

COST STATEMENT

199 WORDS @ 5 cents \$ 9.95
I hereby certify this is correct, due and unpaid (paid).

E. R. Morrisette, Jr.
Editor.

was published in said newspaper for 3 consecutive weeks in the following issues:

Date of 1st publication May 30, 1957 Vol. 68 No. 20

Date of 2nd publication June 6, 1957 Vol. 68 No. 21

Date of 3rd publication June 13, 1957 Vol. 68 No. 22

Date of 4th publication _____, 195____ Vol. _____ No. _____

Subscribed and sworn before the undersigned this 17 day of June, 1957.

Warreny Martin
Notary Public, Baldwin County.

E. R. Morrisette, Jr.
Editor.

Notice of Levy on Real Estate

Chester A. Stapleton and
 Royal H. Stapleton Plaintiff,

vs.

James B. Grabtze Defendant

Baldwin County Circuit Court

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 : 1/2 undivided interest in and to
the following described real property in Baldwin County
Alabama, in original Sec. 37, T. 8 S., R. 5 E, to wit:
Lot 110 of Bear Point Estates, a subdivision, according to
map book 4, P. 103 of records of Judge of Probate of
Baldwin County, Alabama

STATE OF ALABAMA, BALDWIN COUNTY
 Filed 5-16-57
 Recd Sec 4
 Los Pend
 4P.
 363
 J. R. Stuart
 Judge of Probate

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

Given under my hand this 16th day of May 1957

Jay W. Wilkins
 Sheriff of Baldwin County, Alabama

BOOK 004 PAGE 363

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.

MAY

TERM, 19 57

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James B. Crabtree

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 B.

Crabtree

Defendant.

by Chester A. Stapleton and Royal H. Stapleton

Plaintiff.

Witness my hand this 3 day of May 19 57.

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Cliff J. Albrecht, Clerk

CHESTER A. STAPLETON and
ROYAL H. STAPLETON,

PLAINTIFF

VS.

JAMES B. CRABTREE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW. NO. _____.

COUNT I

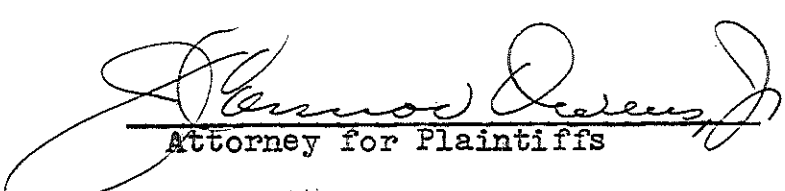
The plaintiffs claim of the defendant FOUR HUNDRED (\$400.00) DOLLARS, due by promissory note made by him on the 26th day of February, 1946, and payable on the following days and amounts, to-wit: TWO HUNDRED AND FIFTY (\$250.00) DOLLARS on June 1, 1946, and ONE HUNDRED AND FIFTY (\$150.00) DOLLARS on November 1, 1946, with interest thereon.

That in and by the terms of said note, defendant waived all rights of exemption as to personal property under the laws of the State of Alabama, and plaintiffs claim the benefit of said waiver.

That in and by the terms of said note, defendant agreed to pay the cost of the collection of said note, including a reasonable attorney's fee, and plaintiffs further claim the sum of \$60.00 as a reasonable attorney's fee in the premises.

COUNT II

The plaintiffs claim of the defendant the sum of FOUR HUNDRED (\$400.00) DOLLARS, for the use and occupation by him of the following tract of land, to-wit: South half of the Southwest Quarter of Section 23, Township 2 South, Range 3 East, Baldwin County, Alabama, belonging to the plaintiffs, from the 26th day of February, 1946, to the 25th day of February, 1947, with interest thereon from the 25th day of February, 1947.


Attorney for Plaintiffs

Not Secured

STATE OF ALABAMA
BALDWIN COUNTY

ATTACHMENT AFFIDAVIT

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, Reice J. Drake,
Clerk of Circuit Court in and for said State and County,
personally appeared J. Connor Owens, Jr., attorney for
Chester A. Stapleton and Royal H. Stapleton, who being
duly sworn, on oath saith that James B. Crabtree is
justly indebted to the said Chester A. Stapleton and
Royal H. Stapleton in the sum of \$400.00 with interest
thereon since November 1, 1946, which said amount is
justly due after allowing all just offsets and discounts,
and that the said James B. Crabtree resides out of the
State of Alabama, to-wit: Pensacola, Florida, and that
this attachment is not sued out for the purpose of vexing
or harassing the Defendant, or other improper motive.

Subscribed and sworn to before me this the J. Connor Owens, Jr.

day of May, 1957.

Reice J. Drake

CHESTER A. STAPLETON &
ROYAL H. STAPLETON
Plaintiffs

vs

JAMES B. CRABTREE
Defendant

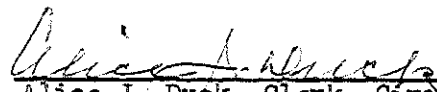
)
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA:
)
) AT LAW. NO. 3234
)

NOTICE

I, Alice J. Duck, Clerk of the Circuit Court of said County and State do hereby certify that I am this day mailing instruments in the above styled cause as follows:

1. Copy of Summons and Complaint.
2. Copy of Attachment.
3. Notice to Non-Resident.
4. Copy of publication of Notice of Attachment to Non-Resident, to James B. Crabtree, 2722 North Q St., Pensacola, Florida.

Witness my hand this the 8th day of May, 1957.



Alice J. Duck, Clerk, Circuit Court
Baldwin County, Alabama

The State of Alabama, {
Baldwin County

No. _____

CIRCUIT COURT

May

Term, 19 57Chester A. Stapleton andRoyal H. Stapleton

PLAINTIFFS

vs.

ATTACHMENT

James B. Crabtree

DEFENDANTS

WHEREAS, Chester A. Stapleton and Royal H. Stapleton

as Plaintiff S in said cause, has obtained an Attachment out of this Court, issued the 3rd
day of May 19 57, against the estate of the said defendant

James B. Crabtree

which Attachment has been levied upon the following described Real estate

as the property of the said defendant, to-wit:

1/2 undivided interest in and to real property

in Baldwin County, Alabama, in original section

37, T. 8 S., R. 5 E., described as being

Lot 110 of Bear Point Estates, a subdivision,

Map Book 4, p. 103, of the records of the

Judge of Probate of Baldwin County, Alabama.

and whereas, it appears that the said

James B. Crabtree

Defendant as aforesaid is non-resident of the State of Alabama and resides in
Pensacola, Florida

NOW, THEREFORE, the said James B. Crabtree

wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 15 day of May, 19 57.

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Bessie J. Buck, Clerk

ATTACHMENT

The State of Alabama, {
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, J. Connor Owens, Jr., as attorney for Chester
A. Stapleton and Royal H. Stapleton

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

is justly indebted to the Plaintiff s Chester A. Stapleton and Royal H. Stapleton

in the sum of FOUR HUNDRED (\$400.) Dollars, ~~and~~
with interest thereon
and J. Connor Owens, Jr. 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 B. Crabtree

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 3 day of MAY A. D., 19 57.

Without bond. Defendant is
a resident of the State
of Florida.

Alice J. Duck Clerk.