

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

October 26, 1957

3371

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Ala.

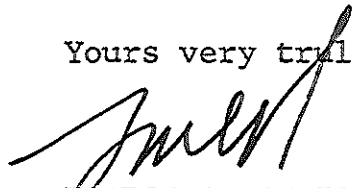
Re: Farmers & Merchants Bank  
vs: Victor Muzik

Mac Muzik

Dear Mrs. Duck:

Enclosed you will find an affidavit and bond in two detinue suits. I assume that you will make out the order to Sheriff to Take Property into Possession, since I do not have these forms.

Yours very truly,

  
FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon VICTOR MUZIK to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of the FARMERS & MERCHANTS BANK, Foley, Alabama.

You are hereby commanded to execute this process instantler and make return as required by law.

Witness my hand this the 28 day of October, 1957.

W. J. Smith  
Clerk

FILED

OCT 28 1957

W. J. Smith, Clerk

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COMPLAINT

FARMERS & MERCHANTS BANK,  
FOLEY, ALABAMA,

PLAINTIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS:

AT LAW

VICTOR MUZIK,

DEFENDANT

The plaintiff claims of the defendant the following described personal property, to wit:

International M Model Tractor; International H. Model Tractor; 1955 Model Plymouth 2-door Hardtop Sedan, Motor No. P27-122915, Serial No. 22204322; Bell City one row corn picker; 2 International tractor cultivators; Allis-Chalmers all crop harvester (Sacker Model); International 8' grain drill; International 7' disc; Oliver 16" double bottom plow; Iron Age 2 row potato planter; International 2 row potato digger; John Deere power mowing machine; Allis Chalmers all crop harvester (Bin Model); International side delivery hay rake; Oliver 16" three bottom plow; 1948 Model Plymouth 4 door sedan; 1949 Model Ford V8 Fordor Sedan; 1952 Model Plymouth Convertable; 1950 Model Pontiac 4 door Sedan; and 1953 Model Dodge 2 door Hardtop Sedan,

with the value of the use thereof from, to wit: the 7th day of January, 1957.

W. J. Smith  
Attorney for Plaintiff

Defendant lives at  
Silverhill, Alabama.

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

August 22, 1959

Mrs. Alice Duck  
Clerk of Court  
Bay Minette, Alabama

Dear Mrs. Duck:

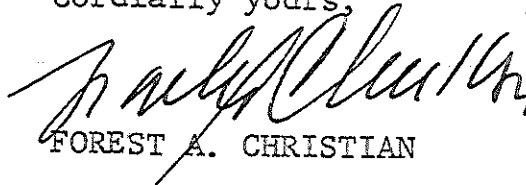
I received a Court calendar and jury list and I want to compliment you on the fine work your machine does. This certainly will be handy when you rework the jury lists.

However, there is one thing I think you should put on the docket and it always bothers me. I would like to suggest that in the lower left hand corner that you number each page and that when you get to the last page that you say, for example, "5th and last page". I always wonder whether or not my calendar has all of its pages or if one has been left out.

This is not to criticize, but it is to offer a constructive suggestion which I hope you will believe will improve your work.

With best wishes, I am

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon VICTOR MUZIK to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of the FARMERS & MERCHANTS BANK, Foley, Alabama.

You are hereby commanded to execute this process instantly and make return as required by law.

Witness my hand this the 24th day of August, 1959.

\_\_\_\_\_  
Clerk

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COMPLAINT

FARMERS & MERCHANTS BANK,  
FOLEY, ALABAMA,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

VICTOR MUZIK,

DEFENDANT

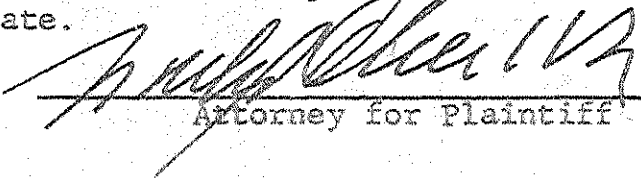
AT LAW

The plaintiff claims of the defendant the following described personal property, to wit:

International M. Model Tractor; International H. Model Tractor; 1955 Model Plymouth 2-door Hardtop Sedan, Motor No. P27-122915, Serial No. 22204322; Bell City one row corn picker; 2 International tractor cultivators; Allis-Chalmers all crop harvester (Sacker Model); International 8' grain drill; International 7' disc; Oliver 16" double bottom plow; Iron Age 2 row potato planter; International 2 row potato digger; John Deere power mowing machine; Allis Chalmers all crop harvester (Bin Model); International side delivery hay rake; Oliver 16" three bottom plow; 1948 Model Plymouth 4 door sedan; 1949 Model Ford V8 Fordor Sedan; 1952 Model Plymouth Convertable; 1950 Model Pontiac 4 door Sedan; and 1953 Model Dodge 2 door Hardtop Sedan,

with the value of the use thereof from, to wit: the 7th day of January, 1957.

The Affidavit dated October 26, 1957 and recorded in Book 195 and the bond filed October 28, 1959 and recorded in Book 196 are hereby refiled and put into full force and effect this being formerly case No. 3371, which was non-suited because it was impossible to serve defendant as he was absent from the State.

  
\_\_\_\_\_  
Attorney for Plaintiff

Defendant lives at  
Silverhill, Alabama

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon VICTOR MUZIK to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of the FARMERS & MERCHANTS BANK, Foley, Alabama.

You are hereby commanded to execute this process instantly and make return as required by law.

Witness my hand this the 24th day of August, 1959.

\_\_\_\_\_  
Clerk

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COMPLAINT

FARMERS & MERCHANTS BANK,  
FOLEY, ALABAMA,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

VICTOR MUZIK,

DEFENDANT

AT LAW

The plaintiff claims of the defendant the following described personal property, to wit:

International M. Model Tractor; International H. Model Tractor; 1955 Model Plymouth 2-door Hardtop Sedan, Motor No. P27-122915, Serial No. 22204322; Bell City one row corn picker; 2 International tractor cultivators; Allis-Chalmers all crop harvester (Sacker Model); International 8' grain drill; International 7' disc; Oliver 16" double bottom plow; Iron Age 2 row potato planter; International 2 row potato digger; John Deere power mowing machine; Allis Chalmers all crop harvester (Bin Model); International side delivery hay rake; Oliver 16" three bottom plow; 1948 Model Plymouth 4 door sedan; 1949 Model Ford V8 Fordor Sedan; 1952 Model Plymouth Convertable; 1950 Model Pontiac 4 door Sedan; and 1953 Model Dodge 2 door Hardtop Sedan,

with the value of the use thereof from, to wit: the 7th day of January, 1957.

The Affidavit dated October 26, 1957 and recorded in Book 195 and the bond filed October 28, 1959 and recorded in Book 196 are hereby refiled and put into full force and effect this being formerly case No. 3371, which was non-suited because it was impossible to serve defendant as he was absent from the State.

  
\_\_\_\_\_  
Attorney for Plaintiff

Defendant lives at  
Silverhill, Alabama

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK  
FOLEY, ALABAMA

PLAINTIFF

VS:

VICTOR MUZIK,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

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LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

AFFIDAVIT

FARMERS & MERCHANTS BANK  
FOLEY, ALABAMA,

PLAINTIFF

VS:

VICTOR MUZIK,

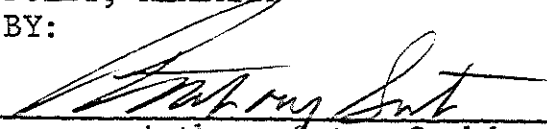
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Before me, Forest A. Christian, a Notary Public in and for said County and State, personally appeared Anthony Sute, Cashier of the Farmers & Merchants Bank of Foley, Alabama, who, being duly sworn, deposeth and saith, That the property sued for in the complaint of FARMERS & MERCHANTS BANK, FOLEY, ALABAMA, vs: VICTOR MUZIK, belongs to the FARMERS & MERCHANTS BANK, the said plaintiff.

FARMERS & MERCHANTS BANK  
FOLEY, ALABAMA  
BY:

  
Anthony Sute, Cashier

Sworn to and subscribed before  
me this the 26th day of October,  
1957.

*Filed Oct. 28, 1957*

  
Notary Public

~~207~~ 195

BOND

THE STATE OF ALABAMA, )

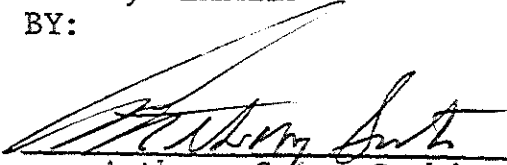
BALDWIN COUNTY. )

KNOW ALL MEN BY THESE PRESENTS, That the FARMERS & MERCHANTS BANK of Foley, Alabama, is held and firmly bound unto VICTOR MUZIK in the sum of FIFTY & 00/100 DOLLARS (\$50.00), to be paid to the said VICTOR MUZIK, his 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 and firmly, by these presents. Sealed with our seals, and dated this the 26th day of October, 1957.


The condition of the above obligation is such, that whereas the above bound FARMERS & MERCHANTS BANK of Foley, Alabama, on the day of the date hereof hath obtained at the suit of FARMERS & MERCHANTS BANK of Foley, Alabama vs: VICTOR MUZIK, a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession", as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County, Alabama, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said plaintiff shall fail in this suit, and shall pay the defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

FARMERS & MERCHANTS BANK  
FOLEY, ALABAMA  
BY:

  
Anthony Syte, Cashier (SEAL)

Approved this the 28  
day of October, 1957.

  
Clerk



SUMMONS

THE STATE OF ALABAMA, )


BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon VICTOR MUZIK to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of the FARMERS & MERCHANTS BANK, Foley, Alabama.

You are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this the 28 day of October, 1957.

  
Clerk

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COMPLAINT

FARMERS & MERCHANTS BANK,  
FOLEY, ALABAMA,

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

VS:

AT LAW

VICTOR MUZIK,

DEFENDANT

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with the value of the use thereof from, to wit: the 7th day of January, 1957.

  
Attorney for Plaintiff

Defendant lives at  
Silverhill, Alabama.

served a copy of the within summons by  
on *Victor Muzik*

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

Returned *25* day of *Nov* 19*57*

Not found in my county after diligent search and in-  
quiry. *Victor Muzik a said*

*property Taylor Wilkins, Sheriff*

By *Stadham*  
Deputy Sheriff

*NFL*  
*Stadham*

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK  
FOLEY, ALABAMA

PLAINTIFF

VS:

VICTOR MUZIK,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 28 1957

ALICE J. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA