

SUMMONS AND COMPLAINT

3422
Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

.....December.....TERM, 1957.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Robert Parker, Jr. and Helen Parker

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 Robert

Parker, Jr. and Helen Parker, Defendant S.....

by William A. Bozone, Jr. doing business as Leadway Food Store

....., Plaintiff.....

Witness my hand this 9 day of December 1957...

Beicy J. Buck, Clerk

WILLIAM A. BOZONE, JR.
Doing Business as
Leadway Food Store,

Plaintiff

VS.

ROBERT PARKER, JR and
HELEN PARKER,

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

COUNT ONE

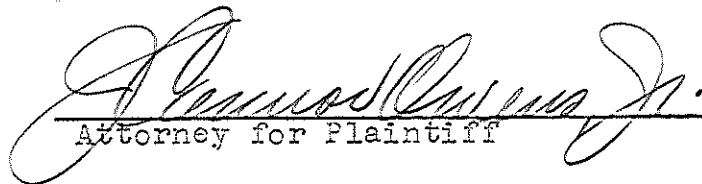
Plaintiff claims of the Defendants the sum of \$430.67, together with the interest thereon, due by account by and between the Plaintiff and Defendants on, to-wit, the 1st day of November, 1957, which sum of money together with the interest thereon is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendants the sum of \$430.67, together with the interest thereon, due by account stated by and between the Plaintiff and Defendants on, to-wit, the 1st day of November, 1957, which sum of money together with the interest thereon is still due and unpaid.

COUNT THREE

Plaintiff claims of the Defendants the sum of \$430.67, together with the interest thereon, due for goods, wares, and merchandise sold by the Plaintiff to the Defendants on to-wit, the 6th day of September, 1957, and for several years previous thereto, at Defendants' request, which sum of money together with the interest thereon, is still due and unpaid.


Attorney for Plaintiff

cei: 9 day of Dec. 1957
d on 11 day of Dec. 1957
served a S/C. of the within
n Robert Parker Jr. and Helen
Parker.

y service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.

2 miles north
of B.M.

Sheriff claims 4 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Talbert
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 342-2

WILLIAM A. BOZONE, JR.
D/b/a Leadway Food Store,

PLAINTIFF

VS.

ROBERT PARKER, JR. and
HELEN PARKER,

DEFENDANTS

SUMMONS AND COMPLAINT

FILED

DEC 9 1957

ALICE L. DUCK, Clerk

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

Defendant lives by Old Drive-in
Theater.

The State of Alabama,
Baldwin County

-TERM, 1959-

, Clerk.

Exp. April 16, 1959

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid J. Connor Owens, Jr., attorney of record

who being duly sworn, on oath says, that a regular _____ Term

of the Circuit Court of Baldwin County, to-wit: on the 6th day of March

1958, William A. Bozone, d/b/a Leadway Store

recovered a judgment against Robert Parker and Helen Parker

_____ for the sum of

FOUR HUNDRED FORTY and 67/100 (\$440.67) _____ Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

Baldwin Pole & Piling Co., Inc.

supposed to be indebted to or have effects of the said Robert Parker

in its possession, or under its control, and that he believes process of

Garnishment against said Baldwin Pole & Piling Co., Inc.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 15th

day of Apr A. D. 1958

Alice J. Duck
Clerk.

J. Connor Owens, Jr.

State of Alabama

BALDWIN COUNTY

TO Robert Parker, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

William A. Bozone, d/b/a Leadway Store, Plaintiff,

versus Robert Parker and Helen Parker, Defendants,

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

Baldwin Pole & Piling Co., Inc.

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the

day of April, 1949.

Perce J. ...
Clerk of the Circuit Court.

129

Ex. April 24, 1949