

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

February-----TERM, 1959

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lottie L. Christopher and Elba B. Isbell

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 Howard M. Knapp,

Lottie L. Christopher and Elba B. Isbell-----, Defendants--

by Central Bank of Mobile, a corporation-----

-----, Plaintiff--

Witness my hand this 19 day of February 1959.

Not Served

166

Archie J. Smith Clerk

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ....

February TERM, 19 59

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lottie L. Christopher and Elba B. Isbell

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 Howard M. Knapp,  
Lottie L. Christopher and Elba B. Isbell, Defendant .....S

by Central Bank of Mobile, a corporation

Plaintiff.....

Witness my hand this 19 day of February 1959.

Allice J. Newell, Clerk

CENTRAL BANK OF MOBILE,  
a corporation,

Plaintiff

vs.

HOWARD M. KNAPP,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. \_\_\_\_\_

Now comes the Plaintiff in this cause and amends its Bill of Complaint by adding thereto, as parties defendant, the following named persons: Lottie L. Christopher and Elba B. Isbell; and by adding thereto the following as Count Two:

COUNT TWO

The Plaintiff claims of the defendants the sum of \$285.10, the balance due on a promissory note made by Howard M. Knapp on the 19th day of October, 1956, and due in 18 installments of \$31.00 each, except the first installment of \$30.00 payable in successive months beginning November 25, 1956, together with interest thereon from April 25, 1958, which said note was endorsed by the Defendants, and said note not being paid at maturity, and duly protested, of which protest the Defendants had due notice, the Plaintiff alleges that said note in the balance due, is still unpaid.

Plaintiff further alleges that in and by the terms of said note, the Defendant, Howard M. Knapp, agreed to pay all costs of collection of the same, and the Plaintiff claims the further and additional sum of \$42.00 as a reasonable attorney's fee in the premises, as said fee is provided for in said note.

*James R. Curry, Jr.*  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

February TERM, 19 59

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lottie L. Christopher and Elba B. Isbell

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 Howard M. Knapp,  
Lottie L. Christopher and Elba B. Isbell, Defendant ..... S

by Central Bank of Mobile, a corporation

Plaintiff.....

Witness my hand this 19 day of February 1959....

Wm. J. Leach, Clerk

CENTRAL BANK OF MOBILE,  
a corporation,

Plaintiff

vs.

HOWARD M. KNAPP,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. \_\_\_\_\_

Now comes the Plaintiff in this cause and amends its Bill of Complaint by adding thereto, as parties defendant, the following named persons: Lottie L. Christopher and Elba B. Isbell; and by adding thereto the following as Count Two:

COUNT TWO

The Plaintiff claims of the defendants the sum of \$285.10, the balance due on a promissory note made by Howard M. Knapp on the 19th day of October, 1956, and due in 18 installments of \$31.00 each, except the first installment of \$30.00 payable in successive months beginning November 25, 1956, together with interest thereon from April 25, 1958, which said note was endorsed by the Defendants, and said note not being paid at maturity, and duly protested, of which protest the Defendants had due notice, the Plaintiff alleges that said note in the balance due, is still unpaid.

Plaintiff further alleges that in and by the terms of said note, the Defendant, Howard M. Knapp, agreed to pay all costs of collection of the same, and the Plaintiff claims the further and additional sum of \$42.00 as a reasonable attorney's fee in the premises, as said fee is provided for in said note.

*James C. Curry, Jr.*  
Attorney for Plaintiff

CENTRAL BANK OF MOBILE,  
a corporation,

Plaintiff

vs.

HOWARD M. KNAPP,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

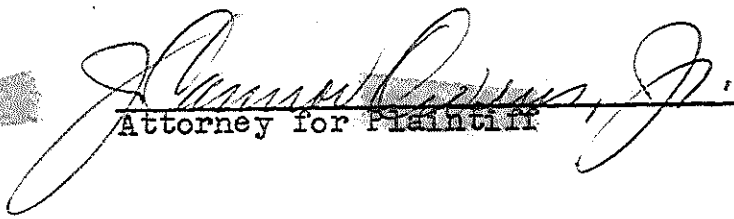
NO. \_\_\_\_\_

Now comes the Plaintiff in this cause and amends its Bill of Complaint by adding thereto, as parties defendant, the following named persons: Lottie L. Christopher and Elba B. Isbell; and by adding thereto the following as Count Two:

COUNT TWO

The Plaintiff claims of the defendants the sum of \$285.10, the balance due on a promissory note made by Howard M. Knapp on the 19th day of October, 1956, and due in 18 installments of \$31.00 each, except the first installment of \$30.00 payable in successive months beginning November 25, 1956, together with interest thereon from April 25, 1958, which said note was endorsed by the Defendants, and said note not being paid at maturity, and duly protested, of which protest the Defendants had due notice, the Plaintiff alleges that said note in the balance due, is still unpaid.

Plaintiff further alleges that in and by the terms of said note, the Defendant, Howard M. Knapp, agreed to pay all costs of collection of the same, and the Plaintiff claims the further and additional sum of \$42.00 as a reasonable attorney's fee in the premises, as said fee is provided for in said note.

  
Attorney for Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW NO. 3603

\*\*\*\*\*

CENTRAL BANK OF MOBILE,  
Plaintiff

vs.

HOWARD M. KNAPP, LOTTIE L.  
CHRISTOPHER, and ELBA B.  
ISBELL,

Defendants

\*\*\*\*\*

AMENDED SUMMONS AND COMPLAINT

\*\*\*\*\*

RECEIVED

FEB 9 1959

SHERIFF'S OFFICE

Received 19 day of Feb 19 59

and on \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

I served a copy of the within A & C

on \_\_\_\_\_

By service of \_\_\_\_\_

By \_\_\_\_\_

TAYLOR WILKINS, Sheriff

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

FILED

FEB 19 1959

ALICE J. DUCK, CLERK  
REGISTER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

Christopher-2305 Roosevelt Ave.  
Isbell-556 Kent St., both in  
Mobile, Alabama.

P.O. Box 22, J. Bridges

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

June TERM, 19.58

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Howard M. Knapp

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 Howard M. Knapp

Defendant .....

by Central Bank of Mobile, a corporation

Plaintiff .....

Witness my hand this 28 day of June 19.58.

165

Alice J. Luck, Clerk



CENTRAL BANK OF MOBILE,  
a corporation,

Plaintiff

vs.

HOWARD M. KNAPP,

Defendant

IN THE CIRCUIT COURT OF

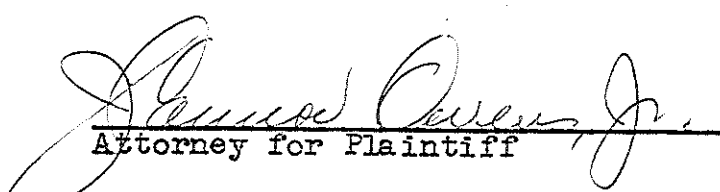
BALDWIN COUNTY, ALABAMA

IN LAW NO. \_\_\_\_\_.

The plaintiff claims of the defendant the sum of \$285.10, the balance due on a promissory note made by him on the 19th day of October, 1956, and due in 18 installments of \$31.00 each, except the first installment of \$30.00 payable in successive months beginning November 25, 1956, together with interest thereon from April 25, 1958.

Plaintiff further alleges that in and by the terms of said note, the defendant waived all rights of homestead and exemption under the laws of the State of Alabama, and plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note, the defendant agreed to pay all costs of collection of the same, and the plaintiff claims the further and additional sum of \$42.00 as a reasonable attorney's fee in the premises, as said fee is provided for in said note.

  
Attorney for Plaintiff

*Entered Oct. 18, 1958*



The State of Alabama,

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 19....., of the Circuit Court of Baldwin County, to-wit: On the 24th day of April, 1959....., being a regular day of said term, Central Bank of Mobile, a corporation

recovered judgment against Howard M. Knapp

and the balance due on said judgment is \$79.10 plus interest in the amount of \$149.00, or a total of \$228.10 plus costs.

~~For the sum of THREE HUNDRED SEVENTEEN AND 10/100 Dollars~~ and cost of suit,

and affidavit having been made by J. Connor Owens, Jr.

that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

POSER PRINTING COMPANY

FAIRHOPE, ALABAMA

has or is believed to have in its possession, or under its control money or effects belonging to said defendant..... or that it is, or is believed to be indebted to said defendant..... or to be liable to them, or to one of them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property..

You Are Therefore Hereby Commanded to Summon .....

POSER PRINTING COMPANY

FAIRHOPE, ALABAMA

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, within thirty days from date of service hereof

then and there within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the making..... its answer, or at any time intervening the time of serving the garnishment, and making the answer..... it was ..... indebted to said defendant ..... and whether it will not be indebted in future to said defendant

..... by a contract then existing, and whether by a contract then existing ..... it is, or are, liable to said defendants for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether it has not in its possession or under its control money or effects belonging to the defendant..... Howard M. Knapp

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 9th day of March, A. D., 1967...

Issued 9th day of March, A. D., 1967

ATTEST:

Alice J. Duck, Clerk.

24-3-16-67

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.

who being duly sworn, on oath says, that a regular Term  
of the Circuit Court of Baldwin County, to-wit: on the 24th day of April  
19 59, Central Bank of Mobile, a corporation  
recovered a judgment against Howard M. Knapp

for the sum of  
THREE HUNDRED SEVENTEEN AND 10/100----- Dollars  
besides costs of suit; that said judgment remains ~~wholly~~ partially  
unsatisfied and in full force and effect: that  
Poser Printing Company, Fairhope, Alabama

supposed to be indebted to or have effects of the said Howard M. Knapp  
in its possession, or under its Control, and that he believes process of  
Garnishment against said Howard M. Knapp  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 9th  
day of March A. D. 19 67

*Alice J. Duck*  
Clerk.

*J. Connor Owens, Jr.*

FILED  
MAY 1 1967  
CLERK  
ALABAMA

STATE OF ALABAMA

Baldwin County

TO ..... HOWARD M. KNAPP  
..... ROUTE 1, BOX 87, Defendant.....:  
..... FAIRHOPE, ALABAMA

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

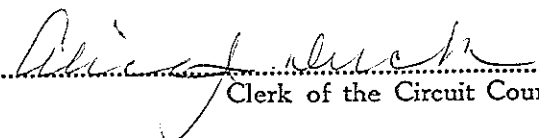
Central Bank of Mobile, a corporation  
....., Plaintiff.....,versus ..... Howard M. Knapp  
....., Defendant.....,

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

POSER PRINTING COMPANY, Fairhope, Alabama  
.....

ha..... been named as Garnishee.....

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

9  
.....day of ..... March....., 19..67.  
.....  
Clerk of the Circuit Court.

243-16-67