The State of Alabama,	Circuit Court, Baldwin (	County
Baldwin County.  TO ANY SHERIFF OF THE STATE	NoFebruary February	TERM, 19 <b>.59</b>
You Are Hereby Commanded to Summo	on Lottie L. Christopher and	Elba B. Isbe
	,	
to appear and plead, answer or demur, w	ithin thirty days from the service hereof, to the	complaint filed in
the Circuit Court of Baldwin County, Sta	ate of Alabama, at Bay Minette, against_ <b>Howa</b>	rd M. Knapp,
Lottie L. Christopher an	d Elba B. Isbell	, DefendantS
byCentral_Bank_of_Mobi	le, a corporation	·
		, Plaintiff
Witness my hand this	day of February19_59.	
	$\wedge$	Samuel Commence St.

166

## THE STATE OF ALABAMA.

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

CIRCUIT COURT, I	BALDWIN	COUNTY
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No	
February TERM,	<sup>19</sup> ട്യ

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				in thirty day	1			omplaint ard M.		
Circuit C	Court of Bal	dwin Count	ty, State	of Alabama,	at Bay M	inette, a		ard M.	. Kna	ībb
Circuit C	court of Bal	dwin Count	ty, State o	of Alabama,	at Bay M B <b>. Isb</b>	inette, as		425	. Kna	pp;
Circuit C	court of Bal	dwin Count	ty, State o	of Alabama,	at Bay M B <b>. Isb</b>	inette, as		ard M.	. Kna	pp;
Circuit C	court of Balie L. C	dwin Count	ty, State on the state of Mobile	of Alabama,	at Bay M B <b>. Isb</b>	inette, as		ard M.	. Kna	pp;
Circuit C	court of Balie L. C	dwin Count	ty, State on the state of Mobile	of Alabama, ad Elba	at Bay M B <b>. Isb</b>	inette, and sell tion	gainst	ard M., , Defenda	. Kna	pp,

CENTRAL BANK OF MCBILE, a corporation,

Plaintiff

W. M.

HOWARD M. KNAPP.

Dofondant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

MO.

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

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TEROTOF TO TIME

end Elba B. Isbell

THE	STATE	OF	ALABAMA	
	DIMIL	$\mathbf{C}_{\mathbf{L}}$	WINDUING	٠,

BALDWIN COUNTY

CITCOTT	COULT,	TOTAL AN TIM	COOMIT

Lottie L. Christopher

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

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				s from the service	···	omplaint filed in
the (	•			at Bay Minette, ag	samst	
	THOUGHT THE	htt. TBAODHG	P enc Elos	B. Isbell	<u> </u>	, Defendant
bу	Centra	l Bank of	Mobile, a c	orporetion -		:
		<u> </u>				, Plaintiff
Witn	ess my hand this _	19	day of _	Rebriary	19 <b>5</b> .9	
	A contract of the contract of		The state of the s			
	1 3 5		1	Which	J. Klu	Clark Clark

CENTRAL BANK OF MOBILE, 1 a corporation,

Plaintiff

ws.

HOWARD M. KNAPP.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

Now comes the Plaintiff in this cause and amends its Bill of Complaint by adding thereto, as parties defendant, the following named persons: Lottle L. Christopher and Hiba B. Isbell; and by adding there to the following as Count Twoz

#### 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 Blaintiff alleges that said note in the belance due, is still unpeld.

Blaintiff 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.

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

RETURNED

Not found in my County after dillgent sor chand inquiry.

RAY D. BRIDGES, Sheriff

By Alexander D. S.

## RECEIVED

THE SERVED.

SHERWE'S OFFICE

Received / / day of	Febr 19 50
nd onday of	19
served a copy of the within	
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y service or	The second secon
TRYLLOR WILKI	NS, Sheriff
6v	

IN THE CIRCUIT COURT OF

BALOWIN COUNTY, ALABAMA

IN DA. 3603

CENTRAL BANK OF MOBILE,
Plaintiff

vs.

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

De fendants

\*

AMENDED SUMMONS AND COMPLAINT

\*\*\*\*\*\*\*\*\*\*\*\*\*



J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

topher-2305 Roosevelt Avenue

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

PO Bob II Harrigas

### THE STATE OF ALABAMA,

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

CIRCUIT COURT, BALDWIN COUNT	TY	
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No. ......June.....TERM, 19.58

Vou Are	Hereby Command	ed to Summon	How	rand M Kno	ממי	100 miles 100 miles 100 miles
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Source .			344 144			
o appear	and plead, answe	r or demur, wi	thin thirty days	s from the service	e hereof, to the co	omplaint filed in
he Circu	it Court of Baldw	in County, Stat	e of Alabama,	at Bay Minette,	against Howard	м. Каарр
•	· · · · · · · · · · · · · · · · · · ·				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Defendant
W)	Central Bar	nk of Mobi	le, a com	more tion		
у				<u> </u>		
oy				POT 4 01 011		, Plaintiff
	ny hand this			June	19.58.	

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

Enjerited Det. 18, 1950

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

\*

CENTRAL BANK OF MOBILE, a corporation,

Plaintiff

vs,

HOWARD M. KNAPP,

Defendant

\*

SUMMONS AND COMPLAINT

\*\*\*\*\*\*\*\*\*\*\*\*

F | L E D
JUN 28 1958
ALICE J. DUCK, CLUIK

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

Defendant resides at Fairhope Receives mail at Box 22

Pecelved 8 d	ay of 0 19 18
I served a copy of the	ne within A 9 Co.
an <u>Julius</u>	
By service on	
and the state of t	AYLOR WICKINS, Sheriff  7.6 PUSIT St. D. S.
at 70	rish of r

Sheriff claims 20 miles at Ten Cents per mile Total \$ 2 00 TAYLOR WILKINS, Sheriff

RETURNED 8/8/58

not found in my Common and Amountain RAY D. BRIDGES, Chemical By M. Bolly D. S.

South Williams, Shrifff Shriff Balder

The State of Alabama,	CIRCUIT COURT, BALDWIN COUNTY
Baldwin County	TERM, 19
To any Sheriff of the State of Alabama, G	reeting:
WHEREAS, at a regular	
County, to-wit: On the 24th day	ofApril, 1959, being a regular day of
said term, Central Bank of Mobil	le, a corporation
recovered judgment against Howard	d M. Knapp
and the Palance due on said	.Judgmentlis \$79.10 plus interest in
the amount of \$149.00, or	a total of \$228.10 plus costs.
How the sum of AFIBEE HUNDRED SEM	ENTERING AND ADVANCE CONTROL POLICES, 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 corporation	
·	
FAIRHOPE, ALABAMA	
has or is believed to have inits	possession, or under
or effects belonging to said defendant	is, or
is believed to be indebted to said defendan	at or to be liable to them, or to one of them on a
•	rty, or on a contract for the payment of money which may be
discharged by the delivery of personal prop	perty, or which is payable in personal property
You Are Therefore Hereby Com	manded to Summon
POSER PRINTING COMPANY	
FAIRHOPE, ALABAMA	
	•
to be and appear before the honorable Jud	dge of the Circuit Court for Baldwin County, at the Court hin thirty days from date of service hereof
	Sof the term, to answer on oath, whether at the time of
	king
	nswer was
Control of the second s	Section of the sectio
·	g, and whether by a contract then existingi.t
•	of personal property, or which is payable in personal proper-
ty, and whether it has not in	n its possession or under its
control money or effects belonging to the d	lefendant Howard M. Knapp
Herein fail not, and have you then	and there this Writ.
Witness, ALICE J. DUCK, Clerk of said	Court, this9th day ofMarch,A. D., 19.67
Issued9th_day ofMarch	A. D., 19 <u>6</u> .7
A	ATTEST:
	Alice Chluck Clerk

Ey 3-16-67

VOL 66 PAGE

# 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 ar	ad 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	1 100	***********		
recovered a judgment against Howard M. Knapp		**********		
	ř.			
THREE HUNDRED SEVENTEEN AND 10/100	for the	sum of		
partially besides costs of suit; that said judgment remains xxxxxx unsatisfied and in full force and effect: Poser Printing Company, Fairhope, Alabama  supposed to be indebted to or have effects of the said	•••••••••••••••••••••••••••••••••••••••	***********		
inits Control, and that he	believes pr	ocess of		
Garnishment against said Howard M. Knapp	Ž.	Š		
is necessary to obtain satisfaction of said judgment.				
Sworn to and subscribed this 9th  day of March A. D. 19 67  Clock		77:		
Clerk. DB PAGE 2				

		the contract of the contract o
STATE	of	ALABAMA

Baldwin County

TO HOWARD M: KNAPP ROUTE 1, BOX 87	
ROUTE 1, BUX 87	
FAIRHOPE, ALABAMA YOU ARE HEREBY NOTIFIED that a V	Vrit of Garnishment has been issued in the case of
Central Bank of Mobile, a corporat	ion 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 hereur	nto set my hand and affixed my seal on this the
9 day of March 19.67	
	Clerk of the Circuit Court.
	/Clerk of the Circuit Court.

E+3-16-67