

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

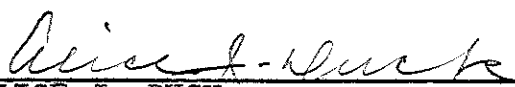
No. 3778

TO: MORRIS TAYLOR

TAKE NOTICE: That Whereas, the Plaintiff, the First National Bank of Bay Minette, a national banking association, has filed its request in writing with the undersigned as Clerk of the Circuit Court of Baldwin County, Alabama, to issue notice to you as the Defendant in the above styled cause and as judgment debtor in the judgment therein rendered, requiring you, under oath, to file a statement in writing of all of your assets, as provided in Title Seven, Section 903 of the Code of Alabama of 1940; and said request now being on file in this office, and it appearing from said request, and the records of this Court, that an execution was issued on the judgment in this cause on May 19, 1959, and that said execution was returned by the Sheriff of Baldwin County, Alabama, on May 25, 1959, with the endorsement thereon, "No Property Found", and that the defendant is a resident of Baldwin County, Alabama;

NOW THEREFORE, you are hereby required, within thirty days from the service hereof, to file in this Court, a statement in writing under oath of all of your assets, including money, choses in action, notes, bonds and accounts, and all other property, including personal property, real estate and mixed, or any interest therein, with a detailed description of the same, the location and reasonable value of each item thereof, together with a statement of all liens, mortgages or encumbrances thereon showing the amounts due upon each and the owner and holder of such liens, encumbrances or mortgages.

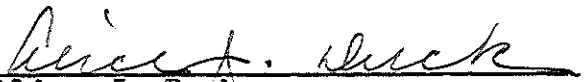
Witness my hand this the 3 day of June, 1959.


ALICE J. DUCK
Clerk of Circuit Court
Baldwin County, Alabama

TO ANY SHERIFF OF THE STATE OF ALABAMA: GREETINGS:

YOU ARE HEREBY COMMANDED to serve the foregoing notice upon Morris Taylor, Defendant, in the above styled cause, and make due return of your said service of this notice within thirty days from this date, how you have executed the same.

Witness my hand this 3 day of June, 1959.


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

Received 3 day of June 1957
and on 4 day of June 1957
served on Morris Taylor of the within
in Bay Minette, Alabama

by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
0 mi

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW No. 3778

FIRST NATIONAL BANK OF
BAY MINETTE,

Plaintiff

vs.

MORRIS TAYLOR,

Defendant

SUMMONS AND REQUEST FOR
DISCOVERY

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____

ORDER FOR EXAMINATION OF THE DEBTOR

This cause being submitted to this Court upon the Application of the Complainant, said application being verified by oath, for an oral examination of Morris Taylor; and,

It appearing to the Court that the Complainant has heretofore recovered a judgment against the said Morris Taylor, and filed in this Court a Bill of Discovery, which said bill was answered by the Defendant, Morris Taylor, within the 30 days; and,

It appearing to the Court that in said answer the said Morris Taylor denied owning any property with the sole exception of certain real estate which was subject to a lien for taxes by the United States and a judgment in favor of the People's Fertilizer Company; and,

It appearing to the Court that the said Complainant, First National Bank of Bay Minette, Alabama, a National Banking Association, has alleged upon oath that the said Defendant, Morris Taylor, owns certain personal property, the location of which is unknown to them; and,

It further appearing to the Court, that said application of the Complainant shows a necessity for oral examination of the debtor;

It is, therefore, ORDERED, ADJUDGED, AND DECREED that the said Morris Taylor be summoned to appear and submit to such examination, said examination to take place at the Courthouse in Bay Minette, Alabama, at 9 AM on the 24th day of August, 1959.

FILED

JUL 28 1959

AUCE L. DUCK, CLERK
REGISTER

Done at Bay Minette, Alabama, this the 28 day of
July, 1959.

Robert M. Stone
Judge

Received 28 day of July 1959
and on 28 day of July 1959
served a copy of the within Order
Morris Taylor

service on _____
TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
Om

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN LAW NO. 3778

FIRST NATIONAL BANK OF
BAY MINETTE, a National
Banking Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

ORDER FOR EXAMINATION
OF THE DEBTOR

FILED
JUL 28-59
WILLIAM L. DUCK, CLERK
REGISTERED

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

FIRST NATIONAL BANK OF
BAY MINETTE, A NATIONAL
BANKING ASSOCIATION,

PLAINTIFF

VS

MORRIS TAYLOR

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 3778

Comes now the Defendant in the above styled cause and for answer to the notice heretofore filed for the Plaintiff in this cause says as follows:

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Morris Taylor, who being by me first duly sworn, deposes and says: My name is Morris Taylor. I am the Defendant in the above styled cause. All the property I own every nature and kind is a six acre tract of land located in the City of Bay Minette, Alabama, adjacent to the Old Daphne Road. This property is subject to a judgement obtained against me by the United States Government and to a judgment heretofore obtained against me by the Peoples Fertilizer Company.

Witness my hand this 2nd day of July, 1959.

Morris Taylor

Sworn to and subscribed before me on this 2nd day of July, 1959.

Robert M. Brantley
Notary Public, Baldwin County, Alabama

3778

FILED

JUL 2 1905

ALICE I. DICK, CLERK
REGISTER

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____

APPLICATION FOR EXAMINATION OF THE DEBTOR

Now comes the Plaintiff in this cause, First National Bank of Bay Minette, a National Banking Association, and files in this case its Application for an oral examination of the said Defendant, Morris Taylor, and shows unto this Court the following:

1. That the Plaintiff in this cause, having obtained a judgment at law upon which execution was issued and been returned "no property found" against the Defendant, Morris Taylor, filed a Bill for the Discovery of the Assets of the Debtor subject to the payments of debts; that within 30 days of the execution of said bill, the Defendant, Morris Taylor, filed upon oath in this Court a statement alleging that he owned no property with the exception of a certain parcel of real estate in Baldwin County, Alabama, which real estate was subject to a tax lien by the United States and also subject to a judgment in favor of the People's Fertilizer Company; and that he owned no other property.

2. Plaintiff alleges that it verily believes that the Defendant, Morris Taylor, owns personal property, the location of such personal property being unknown to the Plaintiff.

WHEREFORE, the Plaintiff, FIRST NATIONAL BANK OF BAY MINETTE, a National Banking Association, prays that this Court order an oral examination of the debtor, Morris Taylor, touching and concerning his property, real or personal, monies, effects, and choses in action, and to set a time and place at which the said debtor may be examined.

FIRST NATIONAL BANK OF BAY MINETTE,
a National Banking Association

By Ray C. Stephens
Executive Vice-President

FILED

7-22-1959

ALICE J. DUCK, CLERK

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for said State and County, personally appeared Ray C. Stephens, upon being duly sworn, did depose and say as follows: that he is the Executive Vice-President of the First National Bank of Bay Minette, a National Banking Association, and that he has read over the foregoing petition, and that the facts alleged therein are true to the best of his knowledge and belief.

Ray C. Stephens

Sworn to and subscribed before me this the 22 day of July, 1959.

James Owens Jr.
Notary Public - State at Large

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3978

FIRST NATIONAL BANK OF
BAY MINETTE, a National
Banking Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

APPLICATION FOR EXAMINATION
OF THE DEBTOR

FILED

JUL 28 1959

CLERK

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____

APPLICATION FOR EXAMINATION OF THE DEBTOR

Now comes the Plaintiff in this cause, First National Bank of Bay Minette, a National Banking Association, and files in this case its Application for an oral examination of the said Defendant, Morris Taylor, and shows unto this Court the following:

1. That the Plaintiff in this cause, having obtained a judgment at law upon which execution was issued and been returned "no property found" against the Defendant, Morris Taylor, filed a Bill for the Discovery of the Assets of the Debtor subject to the payments of debts; that within 30 days of the execution of said bill, the Defendant, Morris Taylor, filed upon oath in this Court a statement alleging that he owned no property with the exception of a certain parcel of real estate in Baldwin County, Alabama, which real estate was subject to a tax lien by the United States and also subject to a judgment in favor of the People's Fertilizer Company; and that he owned no other property.

2. Plaintiff alleges that it verily believes that the Defendant, Morris Taylor, owns personal property, the location of such personal property being unknown to the Plaintiff.

WHEREFORE, the Plaintiff, FIRST NATIONAL BANK OF BAY MINETTE, a National Banking Association, prays that this Court order an oral examination of the debtor, Morris Taylor, touching and concerning his property, real or personal, monies, effects, and choses in action, and to set a time and place at which the said debtor may be examined.

FILED

JUL 22 1933

ALICE J. DUCK, CLERK
REGISTER

FIRST NATIONAL BANK OF BAY MINETTE,
a National Banking Association

By H. Ray Stephens
Executive Vice-President

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for said State and County, personally appeared Ray C. Stephens, upon being duly sworn, did depose and say as follows: that he is the Executive Vice-President of the First National Bank of Bay Minette, a National Banking Association, and that he has read over the foregoing petition, and that the facts alleged therein are true to the best of his knowledge and belief.

Ray C. Stephens

Sworn to and subscribed before me this the 12 day of July, 1959.

W. J. Charnas, Jr.
Notary Public - State at Large

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN LAW NO. 3878

FIRST NATIONAL BANK OF
BAY MINETTE, a National
Banking Association,

Plaintiff,

vs.

MORRIS TAYLOR,

Defendant.

APPLICATION FOR EXAMINATION
OF THE DEBTOR

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

FIRST NATIONAL BANK OF BAY
MINETTE, a national banking
association,

Plaintiff

vs.

MORRIS TAYLOR,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3778

REQUEST FOR DISCOVERY

TO ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA:

WHEREAS, in the above styled cause, the FIRST NATIONAL
BANK OF BAY MINETTE recovered a judgment against the Defend-
ant on the 21st day of April, 1959, for the sum of ONE
THOUSAND EIGHT HUNDRED FIFTY-ONE DOLLARS and TWENTY-TWO CENTS
(\$1,851.22) together with the costs therein incurred; and

WHEREAS, execution was issued on said judgment against
the said Defendant on May 19, 1959, and said execution was
returned on May 25, 1959, with the endorsement thereon "No
Property Found"; and said judgment is still unpaid and unsatis-
fied; now therefore,

This is to request you as the Clerk of the Circuit Court
of Baldwin County, Alabama, to issue a notice to Morris Taylor,
requesting him to file in this Honorable Court, within thirty
days from the service of such notice, a statement in writing,
under oath, of all of the assets of the said Morris Taylor,
including money, choses in action, notes, bonds, and accounts,
and all other property, real, personal or mixed, or any interest
therein, with a detailed description of the same, the location,
and reasonable value of each item thereof, together with a
detailed statement of any and all liens, mortgages, or encum-
brances thereon, showing the amounts due upon each, and the
owner or holder of such liens, encumbrances or mortgages.

The said Defendant resides in Bay Minette, Baldwin County,
Alabama.

Dated this 2nd day of June, 1959.

J. Carroll Owens, Jr.
Attorney for Plaintiff and
Judgment Creditor

filed 6-3-59
Alice J. Duck
clerk

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW No. 3778

FIRST NATIONAL BANK OF
BAY MINETTE,

Plaintiff

vs.

MORRIS TAYLOR,

Defendant

REQUEST FOR DISCOVERY

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

The State of Alabama, {

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, First National Bank
of Bay Minette, a national banking association, and Ray C.
Stephens and W. M. Kelly
 and _____

are held and firmly bound unto Morris Taylor
 in the sum of Thirty two hundred and no/100----- Dollars, for the payment of
 which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and ad-
 ministrators.

Sealed with our seals and dated this 12 day of March 1959.

The condition of the above obligation is such that whereas the said First National Bank
of Bay Minette, a nat'l. Banking assn. did, on the _____ day
 of _____ 19____ sue out of the Circuit Court of Baldwin
County a writ of detinue directed to any Sheriff of the State of Alabama commanding him
 to take into his possession the following property, to-wit: 1 1952 Ford Tractor, Mod. 8N-
Ser. 8N-498504 and equipment; including one for tractor disc
harrow; one for tractor cultivator attachment; 1 1953
Dodge pickup truck; 10 head of feeder hogs and all their
increase; all of the defendants cattle, including 5 head of
range cattle, and their increase.

which said writ was placed in the hands of Taylor Wilkins
 Sheriff of Baldwin County, Alabama, on the _____ day of _____, 19____,
 and executed by him on the 3 day of March, 1959, by taking into his
 possession the following property, to-wit:
the property mentioned above herein.

And whereas the said Morris Taylor
 Defendant in said writ, has failed and neglected for the space of five days from the execution of said writ
 to give bond and take possession of said property as authorized by law.

Now if the said First National Bank of Bay Minette upon his failing
 in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all
 damages for the detention of the property and costs of suit, then this obligation to be void, otherwise to
 remain in full force and effect.

FIRST NATIONAL BANK, BAY MINETTE, ALA. (SEAL)
Ray C. Stephens (SEAL)
W. M. Kelly (SEAL)

Taken and approved this _____ day of _____ 19____

Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Circuit Court, Baldwin County

REPLEVY BOND
OF PLAINTIFF

First National Bank of
Bay Minette

vs.

Morris Taylor

Taken and approved this _____

day of _____, 193____

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Morris Taylor 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 Morris Taylor, Defendant, by the First National Bank of Bay Minette, a national banking association, Plaintiff.

Witness my hand this 27 day of Feb, 1959.

Price J. French, Clerk

TO THE SHERIFF OF SAID COUNTY:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Price J. French, Clerk

*Executed
Mar 3, 1959*

*Within Property
cannot be found
W.A. Folbert U.S.*

FIRST NATIONAL BANK OF
BAY MINETTE, a national
banking association,

Plaintiff

vs.

MORRIS TAYLOR,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

No. _____

COUNT I

The Plaintiff claims of the Defendant the following
personal property, to-wit:

1- 1952 Ford Tractor, Model 8N, Ser. #8N-498504 and
equipment; including one Ford Tractor disc har-
row; one Ford Tractor cultivator attachment.

1- 1953 Dodge Pickup Truck.

10- Head of Feeder Hogs and all their increase.

All of Defendant's cattle, including 5 head of Range
cattle and their increase.

With the value of hire or use thereof during detention, to-
wit: from the 15th day of February, 1959.

COUNT II

The Plaintiff claims of the Defendant the sum of
FIFTEEN HUNDRED EIGHTY-FIVE and 22/100 (\$1585.22) DOLLARS
due by promissory note made by him on the 14th day of Jan-
uary, 1959 and payable in 27 installments of \$60.00 each
and one final installment of \$30.37, the first installment
being due January 24th, 1959, and each successive week
thereafter until paid, with interest thereon from date.

Plaintiff further alleges that in and by said note,
the Defendant waived all rights of exemption as to personal
property under the laws of the State of Alabama, and Plaintiff
claims the benefit of said waiver.

Plaintiff further alleged that in and by the terms of
said note, the Defendant agreed to pay a reasonable attorney's
fee in the event that the same be collected or placed in the
hands of an attorney for collection, and Plaintiff claims the
further and additional sum of \$250.00 as a reasonable attorney's
fee in the premises.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3778

FIRST NATIONAL BANK OF
BAY MINETTE, a national
banking association,

Plaintiff

vs.

Morris Taylor,

Defendant

SUMMONS AND COMPLAINT

FILED

FEB 27 1959

ALICE J. DUCK, CLERK
REGISTER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

Received 27 day of Feb 1959
and on 3 day of March 1959
I served a copy of the within 890
on Morris Taylor
by service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.
Om

*He within Property
cannot be found*

W. A. Talbot

STATE OF ALABAMA }

IN THE CIRCUIT COURT OF

BALDWIN COUNTY }

BALDWIN COUNTY

Before me, J. Connor Owens, Jr., a Notary Public in and for said County, personally appeared Ray C. Stephens who being by me duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL BANK OF BAY MINETTE, a national banking association filed in said Court, to-wit: vs. MORRIS TAYLOR 1- 1952 Ford Tractor, Model 8N, Ser. #8N-498504 and equipment; including one Ford Tractor disc harrow; one Ford Tractor cultivator attachment. 1-1953 Dodge Pickup Truck 10-Head of Feeder Hogs and all their increase. All of Defendant's cattle, including belongs to Morris Taylor, the plaintiff. 5 head of Range cattle and their increase.

First National Bank of Bay Minette

Sworn to and subscribed before me this 27th By Ray C. Stephens

day of February, 1959.

Notary Public

STATE OF ALABAMA }

IN THE CIRCUIT COURT OF

BALDWIN COUNTY }

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, FIRST NATIONAL BANK OF BAY MINETTE, Principal, and Ray C. Stephens and W.M. Kelly, Sureties, are held and firmly bound unto Morris Taylor, his heirs, executors and administrators in the sum of Thirty Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 27th day of February, 1959.

The condition of the above obligation is such that whereas, the above bound FIRST NATIONAL BANK OF BAY MINETTE has on the 27th day of February, 1959. sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Morris Taylor for the recovery of the following described property, to-wit:

1-1952 Ford Tractor, Model 8N, Ser. #8N-498504 and equipment; including one Ford Tractor disc harrow; one Ford Tractor cultivator attachment. 1-1953 Dodge Pickup Truck. 10-Head of Feeder Hogs and all their increase. All of Defendant's cattle, including 5 head of Range cattle and their increase.

Now, if the said FIRST NATIONAL BANK OF BAY MINETTE shall fail in said suit and shall pay to the said Morris Taylor, the defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to be void, otherwise, to remain in full force and effect.

Taken and approved this 27 day of February, 1959. By Ray C. Stephens (SEAL)By Ray C. Stephens (SEAL)By Morris Taylor (SEAL)

Clerk, Circuit Court

No.

THE STATE OF ALABAMA

BALDWIN **COUNTY**

CIRCUIT COURT

FIRST NATIONAL BANK OF
BAY MINETTE, a national
banking association,

Plaintiff

vs.

Morris Taylor

Defendant

Detinue — Affidavit and Bond

FILED

Filed this _____ day of _____, 19____.

FEB 27 1959

ALICE J. DUCK

CLERK
REGISTER

Clerk

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

PLAINTIFF,

VS.

MORRIS TAYLOR,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW

NO. _____.

ORDER SETTING DATE

This cause coming on before the Court on its regular pleading day upon the oral motion of the Solicitor for the Plaintiff to set a date for the examination of the said Defendant, Morris Taylor, said application having been previously made in this cause, and continued from term to term thereafter;

It is, therefore, ORDERED, ADJUDGED, AND DECREED that the said Morris Taylor be summoned to appear and submit to such examination, said examination to take place at the Courthouse in Bay Minette, Alabama, at 10:00 A.M. on the 7th day of January, 1960.

Done at Bay Minette, Alabama, this the 31 day of _____

Dec, 1959.

G. Hubert M. Hester
Judge

Filed 14 3/15/59

Received 4 day of Jan 1960
and on 5 day of Jan 1960
served a copy of the within Order
on Morris Taylor
by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
omi

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 3778

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

PLAINTIFF,

VS.

MORRIS TAYLOR,
DEFENDANT.

ORDER SETTING DATE

Filed
17-31-59
W. A. Talbot
Clerk