

3992

ved _____ day of _____ 19__

n. 20 day of Mar 1959

red a copy of the within _____

Edward A. Welch d/b/a
Buddy Fuller

ervice on _____

TAYLOR WILKINS, Sheriff

By Richard D. S.

Benjamin

urned 19 day of Mar 1959

found in my county after diligent search and hi-

Taylor Wilkins, Sheriff

By [Signature]
Deputy Sheriff

CENTRAL BALDWIN BANK OF
ROBERTSDALE, A CORPORATION,

PLAINTIFF

VS

EDWARD A. WELCH, d/b/a
BUDDY FULLER FARMS

DEFENDANT

BILL OF COMPLAINT

FILED

MAR 16 1959

ALICE L. DUCK, CLERK
REGISTER

[Faint, mostly illegible text, possibly bleed-through from the reverse side of the document]

THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, Central Baldwin Bank of
Robertsdale, a corporation, by C. B. Ellis, Executive Vice President,

....., of the County of Baldwin.....

are held and firmly bound unto Edward A. Welch, d/b/a Buddy Fuller Farm

in the sum of Thirteen Thousand and 00/100 - - Dollars, to

be paid to the said Edward A. Welch, d/b/a Buddy Fuller Farm,
heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind our-
selves and each of us, our and each of our heirs, executors and administrators, jointly and severally, firmly
by these presents.

Sealed with our seals and dated the..... day of March, 1959

The Condition of this Obligation is such:

That whereas, the above bounden Central Baldwin Bank of Robertsdale,
a corporation,..... has, on the day of the date
hereof, prayed an Attachment at the suit of Central Baldwin Bank of Robertsdale, a
corporation,..... against the estate of above named
Edward A. Welch, d/b/a Buddy Fuller Farm

for the sum of Six Thousand four hundred eighty five and 00/100 Dollars,
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said Central Baldwin Bank of Robertsdale, a corporation,
should prosecute said Attachment to effect, and pay the said Defendant all such damages as he
may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be
void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now,
or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

[Handwritten signature]
..... (Seal)

..... (Seal)

..... (Seal)

..... (Seal)

Approved, this 18 day of March, 1959

[Handwritten signature], Clerk

THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, Alice J. Duck, Clerk of the Circuit Court,

in and for said County, personally appeared C. B. Ellis, Executive Vice President

who, being duly sworn, on oath saith that Edward A. Welch, d/b/a Buddy Fuller Farm

is

justly indebted to

Central Baldwin Bank of Robertsedale, a corporation,

in the sum of Six Thousand four hundred eighty five and 00/100

Dollars,

which said amount is justly due after allowing all just offsets and discounts, and that the said

Edward A. Welch, d/b/a Buddy Fuller Farm, is or has fraudulently disposed

of his property,

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

Subscribed and sworn to before me this 18 day of March, 1959.

Alice J. Duck

No. <u>3796</u>	Page
STATE OF ALABAMA Baldwin County	
CIRCUIT COURT At Bay Minette, Ala.	
TO	
ATTACHMENT BOND AND AFFIDAVIT	
Filed this the	day
of	194
	Clerk
	Attorney

State of Alabama

BALDWIN COUNTY

TO Edward A. Welch, Defendant.....

10
ALABAMA
CLERK OF CIRCUIT COURT
BY
NOTICE

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

Central Baldwin Bank of Robertsdale, a Corp., Plaintiff
versus Edward A. Welch, Defendant

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

Sivestash Auction Inc a Corp.

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 17

day of March, 1969

Aricef-venko
Clerk of the Circuit Court.

379

NOTICE
TO DEFENDANT OF GARNISHMENT
BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

Plaintiff.....

VS.

Defendant.....

Received _____ day of _____ 19____

and on 20 day of May 1959

I served a copy of the within Writ
on Edward A. Welch

By service on _____

TAYLOR WILKINS, Sheriff

By Charles R. [Signature]

no mi

~~19 day of Nov 1958~~

~~returned to my county after diligent search and in-
quiry.~~

~~By Taylor Wilkins, Sheriff
Blair [Signature] Deputy Sheriff~~

[Faint handwritten notes and signatures in the bottom right section of the page]

BOND

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Central Baldwin Bank, of Robertsdale, a corporation, by C. B. Ellis
Executive Vice President,

are held and firmly bound unto Edward A. Welch, d/b/a Buddy Fuller Farms

in the sum of ~~Twenty five hundred~~ 6485⁰⁰ DOLLARS,

to be paid to the said Edward A. Welch, d/b/a Buddy Fuller Farms

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, severally and firmly by these Presents.

Sealed with our seals, and dated this day of March 19 59

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

Central Baldwin Bank of Robertsdale, a corporation,

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Edward A. Welch, d/b/a Buddy Fuller Farms

the sum of Six Thousand Four Hundred Eighty Five and 00/100 (\$6485.00) Dollars,

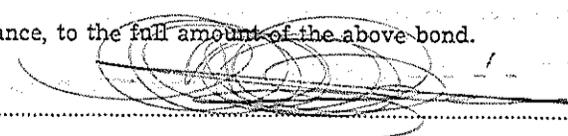
and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

Robertsdale LiveStock Auction, Inc., a corporation,

summoning ~~it~~ it to answer what it is indebted to said Defendant, or what effects of said Defendant has in its possession, or under its control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as he may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we hereby severally certify that we have property free from all incumbrance, to the full amount of the above bond.


..... (Seal)
..... (Seal)
..... (Seal)

Approved this 17 day of March A. D., 19 59.

Devin Welch Clerk.

The State of Alabama, BALDWIN COUNTY.

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared C. B. Ellis, as Executive Vice President of the Central Baldwin Bank of Robertsdale, a corporation,

who, being duly sworn, doth depose and say that Edward A. Welch, d/b/a Buddy Fuller Farms is

indebted to it in the sum of Six Thousand Four Hundred Eighty Five - - - Dollars, and that it has commenced on suit by summons and complaint on said indebtedness against the said Edward A. Welch, d/b/a Buddy Fuller Farms

and that Robertsdale Livestock Auction, Inc., a corporation, supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in its possession, or under its control, and that it believe that process of Garnishment against the said Edward A. Welch, d/b/a Buddy Fuller Farms,

is necessary to obtain satisfaction of said claim; and that the said Robertsdale Livestock Auction, Inc., is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose of vexing or harassing said Defendant, or other improper motives.

Sworn to and subscribed before me this 17 day of March 19 59

Alice J. Duck (signature)

Clerk Circuit Court.

116.

No. 2792

THE STATE OF ALABAMA, BALDWIN COUNTY.

CIRCUIT COURT

Plaintiff

TO

Defendant

Bond and Affidavit in Garnishment on Summons

Filed this day of

19

Clerk.

Printed by the Baldwin Times, Bay Minette, Alabama.

The State of Alabama, {
Baldwin County. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Central Baldwin Bank of Robertsdale, a corporation,

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that
Edward A. Welch, d/b/a Buddy Fuller Farm,

is justly indebted to the Plaintiff Central Baldwin Bank of Robertsdale, a corporation,

in the sum of Six thousand four hundred eighty five and 00/100 Dollars, and

C. B. Ellis, Executive Vice President having made affidavit and given bond
as required by law, in such cases, you are hereby commanded to attach so much of the estate of

Edward A. Welch, d/b/a Buddy Fuller Farm to-wit: 130 head Black Angus Cattle
and all their increase; one John Deere Farm tractor, Serial No. _____
including all equipment; one 1957 G.M.C. 2 ton tractor, Motor No. M353PT2011,
including all equipment and any other personal property belonging to the said
defendant,

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said
County, on _____ Monday of _____ 19_____

next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 18th day of March A. D., 1959.

Alice J. Duck Clerk.

No. 3796

ATTACHMENT

Central Waldwin Bank
of Robertsdale

Vs. { ATTACHMENT

Edward a. Wake
aka Buddy Fuller (Tamm)

Issued _____, 195_____

Printed by Moore Printing Co.

FILED

MAR 18 1959

ALICE J. DUCK, Clerk

Returned unrecorded by order
of Plaintiff's attorney

James A. Johnson
Attorney

BOND

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, Central Baldwin Bank, of Robertsdale, a corporation, by C. E. Ellis
Executive Vice President,

are held and firmly bound unto Edward A. Welch, d/b/a Buddy Fuller Farms

in the sum of ~~Twenty Five Hundred~~ 6485 DOLLARS,
to be paid to the said Edward A. Welch, d/b/a Buddy Fuller Farms

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, severally and firmly by these Presents.

Sealed with our seals, and dated this day of March 1959

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

Central Baldwin Bank of Robertsdale, a corporation,

has..... commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Edward A. Welch, d/b/a Buddy Fuller Farms

the sum of Six Thousand Four Hundred Eighty Five and 00/100 (\$6485.00) Dollars,

and has..... on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to.....

Robertsdale LiveStock Auction, Inc., a corporation,

summoning ~~it~~ it..... to answer what it is..... indebted to said Defendant, or what effects of said Defendant

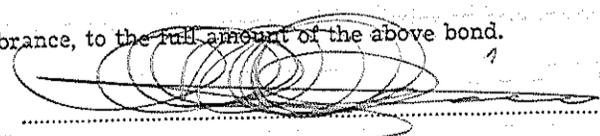
..... has..... in its..... possession, or under its..... control; and said Plain-

tiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff..... shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as he..... may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we..... hereby severally certify that

we..... have property free from all incumbrance, to the full amount of the above bond.

 (Seal)

..... (Seal)

..... (Seal)

Approved this day of A. D., 19.....

..... Clerk.

The State of Alabama, BALDWIN COUNTY.

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared C. B. Ellis, as Executive Vice President of the Central Baldwin Bank of Robertsdale, a corporation,

who, being duly sworn, doth depose and say that Edward A. Welch, d/b/a Buddy Fuller Farms is

indebted to it in the sum of Six Thousand Four Hundred Eighty Five - - - - Dollars, and that it has commenced on suit by summons and complaint on said indebtedness against the said Edward A. Welch, d/b/a Buddy Fuller Farms

and that Robertsdale Livestock Auction, Inc., a corporation, supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in its possession, or under its control, and that it believe that process of Garnishment against the said Edward A. Welch, d/b/a Buddy Fuller Farms,

is necessary to obtain satisfaction of said claim; and that the said Robertsdale Livestock Auction, Inc., is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued-out for the purpose of vexing or harassing said Defendant, or other improper motives.

Sworn to and subscribed before me this March 19 59

Clerk Circuit Court.

116.

No.

THE STATE OF ALABAMA, BALDWIN COUNTY.

CIRCUIT COURT

Plaintiff

TO

Defendant

Bond and Affidavit in Garnishment on Summons

Filed this day of 19

Clerk.

Printed by the Baldwin Times, Bay Minette, Alabama.