

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

June 8, 1959

3859

Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Aaron Bishop  
Vs: Joe Pedigo  
Our File: 4761

With this we are handing you Summons and Complaint,  
Writ of Attachment and Affidavit in the above  
mentioned cause.

Please process and telephone the sheriff immediately,  
and give him this letter with the papers.

Yours very truly,

*E. G. Rickarby*

EGR/ts  
Encl.

*Please phone me  
letting me know this is  
going to Taylor with them.*

E. G. RICKARBY

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AARON BISHOP	*	IN THE CIRCUIT COURT
PLAINTIFF	*	BALDWIN COUNTY,
VS	*	ALABAMA.
JOE PEDIGO	*	AT LAW
DEFENDANT	*	CASE #

COMPLAINT

COUNT ONE: Plaintiff claims of the Defendant Twelve Hundred & No/100 (\$1200.00) Dollars due by promissory note made by him on the 22nd day of July, 1952, with interest at Six per cent (6%) per annum and payable on to-wit, ninety (90) days after date and the Plaintiff avers that in the said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal ptoperty as exempt to him under the Constitution and laws of the State of Alabama and agreed to pay an attorneys fee for the collection thereof and the Plaintiff hereby claims the further sum of Four Hundred Ninety-Five & No/100 (\$495.00) Dollars as such attorneys fee.

  
 E. G. Rickarby  
 Attorney for Plaintiff.

Defendant can be found at Fred Neumiller's warehouse or shipping shed at Loxley, Alabama.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Joe Pedigo

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 .....

Joe Pedigo

....., Defendant.....

by Aaron Bishop

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

Witness my hand this 10 day of June 1959

Archie J. Spack....., Clerk

Ex. 6-10-59

6-10-59

No. 3859

Page

The State of Alabama  
Baldwin County

CIRCUIT COURT

AARON BISHOP

Plaintiffs

vs.

JOE PEDIGO

Defendants

Summons and Complaint

FILED

Filed

19

JUN 10 1959

ALICE J. DUCK,

CLERK  
REGISTER

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Loxley, Alabama.

Received In Office

1959

Sheriff

I have executed this summons

this

1959

by leaving a copy with

Joe Pedigo  
And no property found

Sheriff claims

40 miles at

Ten Cents per mile Total \$

4.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Edleigh Stenhouse

Deputy Sheriff

Loxley, Ala

AARON BISHOP	*	IN THE CIRCUIT COURT
PLAINTIFF	*	BALDWIN COUNTY,
VS	*	ALABAMA.
JOE PEDIGO	*	AT LAW
DEFENDANT	*	CASE #


WRIT OF ATTACHMENT

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETINGS:

Whereas, Aaron Bishop hath complained on oath to me, Alice Duck, Clerk of the Circuit Court of Baldwin County, that Joe Pedigo is justly indebted to Aaron Bishop in the sum of Two Thousand, Thirty-Four & No/100 (\$2,034.00) Dollars; and the said Aaron Bishop having made affidavit but elected not to give bond Joe Pedigo being a nonresident of the State of Alabama.

You are hereby commanded to attach so much of the estate of said Joe Pedigo as will be of value to satisfy the said debts and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, to be held at the Court House thereof, when and where you must make known how you have executed this writ.

Witness: Alice Duck, Clerk of said Court, my hand, this the 10 day of June, 1959.

  
Clerk.

Defendant's Property-- 1951 G.M.C. 2-ton truck, tag, Ala. 5H3 376. His name is on truck; and one Red Trailer, #5-23259 ?

AARON BISHOP

PLAINTIFF

VS

JOE PEDIGO

DEFENDANT

\* IN THE CIRCUIT COURT

\* BALDWIN COUNTY,

\* ALABAMA.

\* AT LAW

\* CASE #

ATTACHMENT & AFFIDAVIT

Before me the undersigned notary public, personally appeared Aaron Bishop, who being duly sworn deposes and says-

That Joe Pedigo is justly indebted to him in the sum of Two Thousand, Thirty-Four and No/100 (\$2,034.00) Dollars, which said amount is justly due and

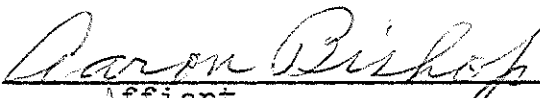
1. That said Joe Pedigo resides out of the State.

2. That Joe Pedigo is about to remove his property out of state and that the Plaintiff will probably lose his debt or have to sue for it in another state.

This attachment is not sued out for the purpose of vexing or harassing the said Defendant.

Subscribed and sworn to this 8th day of June, 1959, before me.

  
Notary Public,  
Baldwin Co. Ala.

  
Affiant

Defendant being a nonresident of the State of Alabama, Plaintiff elects not to give bond.

  
Attorney for Plaintiff.