

STATE OF ALABAMA

BALDWIN COUNTY

3988

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CORBIN WILLIAMS and MARTHA WILLIAMS, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of EMIL MORAVEC.

Witness my hand, this the 25 day of September, 1959.

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

EMIL MORAVEC,
Plaintiff,

vs

CORBIN WILLIAMS and
MARTHA WILLIAMS,
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of TWO HUNDRED THIRTY & No/100 (\$230.00) DOLLARS, balance due by promissory note made by them on the 31st day of December, 1957, which said note is payable in monthly installments of FIVE (\$5.00) DOLLARS each month, said note was executed in the sum of TWO HUNDRED FORTY (\$240.00) DOLLARS, and the Plaintiff admits the payments on the said note of the installments due January and February, 1958; the said note provided that in the event judgment is entered against the maker it shall immediately become due and payable, and the Plaintiff alleges that judgment has been entered against the maker of said note; that the sum of TWO HUNDRED THIRTY (\$230.00) DOLLARS, with interest, is due and unpaid.

The Plaintiff alleges that in and by the said note the Defendants waived all right of exemption under the constitution and laws of the State of Alabama, as to the collection of the said debt, and the plaintiff claims the benefit of such waiver.

The Plaintiff further alleges that in and by the said note the Defendants severally agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee, and the said Plaintiff claims of the Defendants the further and additional sum of FIFTY (\$50.00) DOLLARS, as a reasonable attorney's fee in the premises.

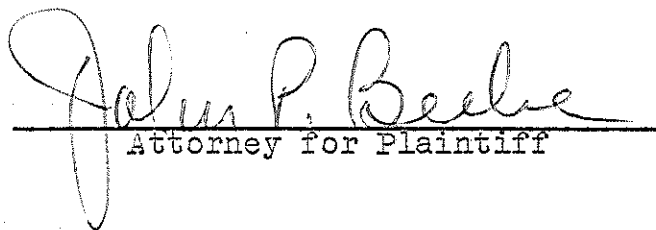
COUNT TWO

The Plaintiff claims of the Defendants the further and additional sum of NINETY SIX (\$96.00) DOLLARS, the rent of a house and lot in the vicinity of the Town of Silverhill, Baldwin County, Alabama, demised by the Plaintiff to the Defendants, said rent commencing on the 1st day of October, 1958, and ending on the 12th day of December, 1958.

FILED

SEP 25 1959

ALICE J. DUCK, Clerk


Attorney for Plaintiff

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3988

Received 23 day of Sept 1959
and on 20 day of Sept-Oct 1959
I served a copy of the within R & C
on Corbin Williams
Martha Williams
By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Stephens D. S.

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
BY ED
DEPUTY SHERIFF

Fairhope, Ala

EMIL MORAVEC,
Plaintiff,

vs

CORBIN WILLIAMS and
MARTHA WILLIAMS,
Defendant.

Summons and Complaint

FILED
SEP 25 1959

ALICE J. DUCK, Clerk

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 17th, 1960

Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

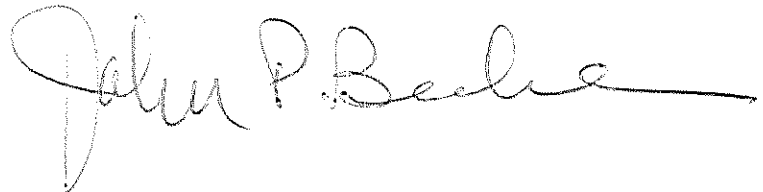
Re: Moravec vs. Corbin & Martha Williams

Dear Mrs. Duck:

I enclose my affidavit which I have signed as the attorney for the plaintiff, together with original and two copies of garnishment on judgment in the matter of the above named.

If you will accept my signature on the affidavit as genuine and place in the hands of the Sheriff the writ of garnishment for service on the two parties named therein I will greatly appreciate it.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe", with a long horizontal flourish extending to the right.