

The State of Alabama, }
Baldwin
MOBILE COUNTY.

CIRCUIT COURT,

Spring

Term, 1916.

Mobile Coal Company, a corporation
organized and carrying on business under the
laws of the state of Alabama, plaintiff,

vs.

R. Fitzgerald, defendant.

1. The plaintiff claims of the defendant two hundred and six & 78/100 dollars due from him by account, on to-wit, March 1, 1915, which sum of money, with the interest thereon, is still unpaid.

2. The plaintiff claims of the defendant two hundred and six and 78/100 dollars due from him on account stated between plaintiff and defendant on to-wit, June 19, 1915, which sum of money, with the interest thereon, is still unpaid.

3. The plaintiff claims of the defendant two hundred and six and 78/100 dollars due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on to-wit, March 1, 1915, which sum of money, with the interest thereon, is still unpaid.

Plaintiff alleges that defendant is a non-resident of Alabama and that his post-office address is "1304 First National Bank Building, Chicago, Illinois."

The account sued on is verified by affidavit and is filed in court with this complaint.

William Lowrey
W. H. Thompson
Plaintiff's Attorneys.

The State of Alabama, }
Baldwin
MOBILE COUNTY.

CIRCUIT COURT,

Term, 191

To any Sheriff of the State of Alabama:

You are hereby commanded to summon

To appear at the next Term of the Circuit Court to be held for said County on the

Monday after the Monday in 191

at the place holding the same, then and there to answer the complaint of

Witness. S. H. SMITH, Clerk of said Court, this day of

in the year of our Lord, one thousand nine hundred and

Issued the day of 191

ATTEST:

Clerk.

acknowledged

security for cost of this suit.

day of

191

[Seal]

No.

CIRCUIT COURT,
Baldwin
MOBILE COUNTY.

VS. { Complaint and Summons.

Issued

day of

191

Returnable

Monday after the

Monday of

191

Plaintiff's Attorney.

SUMMONS AND COMPLAINT

The State of Alabama {

Baldwin County

No.

Circuit Court

February 2nd, 1916

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon E. Fitzgerald

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 him Defendant

by Mobile Coal Company, a Corporation organized and carrying on business
under the laws of the State of Alabama. Plaintiff

Witness my hand this 2nd day of February 1916.

J. W. Richardson Clerk.

COMPLAINT

Plaintiff Versus


The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

Original

No.

 STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT

Mobile Coal Company, a

Corporation.

vs.

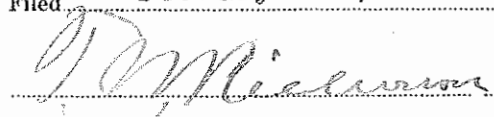
Plaintiff's

R. Fitzgerald.

Defendants

SUMMONS AND COMPLAINT

Filed February 2nd, 1916.

 Clerk

Defendant lives at

1304 1st National Bldg.,

Chicago, Ill.

Plaintiff's Attorney

Wm Cowley &

W. H. Hawkins

Defendant's Attorney

Times Print, Bay Minette

Received in office

February 2nd, 1916.

Sheriff

I have executed this Writ

this 1916

by leaving a copy of the within summons and complaint with

*Copies received by Reginald
R. Fitzgerald
1304 1st National
Bank Bldg. Chicago
Ill - Feb 2/16
J. W. McIlwain
Clerk*

Sheriff

Deputy Sheriff.

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE NO. 7. LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Attachment NoticeMobile Coal Company, PlaintiffsvsR. Fitzgerald, Defendant

Was published in said Newspaper for 3 consecutive weeks in the following issues:

Date of first publication	<u>February 3rd, 1916</u>	Vol. <u>26</u>	No. <u>50</u>
" " second "	<u>February 10th, 1916</u>	Vol. <u>26</u>	No. <u>51</u>
" " third "	<u>February 17th, 1916</u>	Vol. <u>26</u>	No. <u>52</u>
" " fourth "		Vol. _____	No. _____

Subscribed and sworn to before the undersigned

this 20th day of May 1916T. W. RiceClark Agent Court

Abner J. Smith
Publisher.

Attachment Notice
State of Alabama, Baldwin County, Circuit Court, Spring Term, 1916.
Mobile Coal Company, an Alabama Corporation, Plaintiff, vs R. Fitzgerald, Defendant.
Attachment.
Mobile Coal Company, an Alabama Corporation, as Plaintiff, in said cause, has an Attachment out of this Court, issued day of February 1916, against the estate of defendant, R. Fitzgerald, which Attachment has been levied upon the following described lands, $e\frac{1}{2}$ and $sw\frac{1}{4}$ of sec 30, tp 7 s, r 3 also $sw\frac{1}{4}$ less $n\frac{1}{2}$ of $ne\frac{1}{4}$ of $sw\frac{1}{4}$, sec 30, r 3 e, as the property of said defendant, R. Fitzgerald.

The State of Alabama, {
BALDWIN COUNTY. }

To any Sheriff of the State of Alabama:

WHEREAS, ~~Paul Danner Vice President of the Mobile Coal Company~~
~~an Alabama corporation,~~

hath complained on oath to me, T. W. RICHESON, Clerk of the Circuit Court of Baldwin,
that ~~R. Fitzgerald~~

is justly indebted to the Plaintiff ~~Mobile Coal Company an Alabama Corporation,~~

in the sum of ~~two hundred six and 78/100~~ Dollars, and

~~Mobile Coal Company an Ala Corporation~~ 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
~~R. Fitzgerald~~

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, at a term thereof,

to be held at the Court House of said County, on the ~~8th~~ Monday after the ~~4th~~

Monday of ~~March~~ next: when and where you must make known
to said Court how you have executed this Writ.

WITNESS, my hand, this ~~2nd~~ day of ~~February~~

A. D. 191 6

T. W. Richeson Clerk.

No.

ATTACHMENT

Mobile Coal Co.,

Vs. { Attachment

R. Fitzgerald,

Issued

Feb. 2nd,

1916

Baldwin Times Print. Bay Minette, Ala.

Received in office February 2nd, 1916, and executed this 2nd, day of February 1916. at 11 o'clock A.M. by levying on the following real estate as the real property of R. Fitzgerald, described as follows:-

E $\frac{1}{2}$ and S.W. $\frac{1}{4}$ of Sec 30 Tp 7 S. R. 3 E. and also S.W. $\frac{1}{4}$ less N $\frac{1}{2}$ of N.E. $\frac{1}{4}$ of S.W. $\frac{1}{4}$ Sec 29. Tp 7. S. R. 3.E. containing 620 acres of land, in Baldwin County. Alabama.

W. E. Gubert Sheriff
of Baldwin Co., Ala.

Mobile Coal Company,

vs.

Circuit Court Baldwin County, Alabama.

R. Fitzgerald.

Personally appeared before me, *Piedale J. Tourant*

a notary public in and for Mobile County, Alabama, Paul Danner, who is known to me and being by me first duly sworn, deposes and says that he is the Vice-President of the Mobile Coal Company, an Alabama corporation, and has authority to make this affidavit, and that R. Fitzgerald is justly and truly indebted to Mobile Coal Company in the sum of two hundred and six and 78/100 (\$206.78) dollars and that said R. Fitzgerald resides out of the state of Alabama, his address being #1304 First National Bank Building, Chicago, Illinois, so that ordinary process of law cannot be served on him and that an attachment is not sued out for the purpose of vexing or harassing him, the said R. Fitzgerald.

Sworn to and subscribed before
me this *1st* day of Feb., 1916.

Paul Danner

Isabel J. Tourant
Notary Pub for Mobile Co., Ala.

The State of Alabama,
Mobile County.

Before me, the undersigned authority, this day personally appeared Paul Danner, who is known to me, and being by me first duly sworn on his oath deposes and says that he is the Vice-President of Mobile Coal Company, a corporation organized and carrying on business under the laws of the state of Alabama, and as such officer has knowledge of the facts hereinafter set out and has authority to make this affidavit; that R. Fitzgerald is justly and truly indebted to Mobile Coal Company in the sum of two hundred and six and 78/100 (\$206.78) dollars, as set out in the itemized account hereto attached, that said ~~account~~^{account} is just, true, correct and unpaid and that there are no set-offs or counter-claims to same.

Sworn to and subscribed before me this
18 day of Feb., 1916.

Tracy J. J. J.
Notary Public, Mobile County, Ala.

Paul Danner

A.C. DANNER, President.

PAUL DANNER, Vice Pres. & Treas.

R.B. SAVAGE, Secy. & Treas.

COAL,
COKE, CEMENT,
SEWER PIPE,
LIME.

Shipped to
any Point.

IN STOCK
ALABAMA COAL
ALL VARIETIES
COKE,
ANTHRACITE COAL,
PORTLAND CEMENT,
SEWER PIPE.

MOBILE COAL COMPANY.

MOBILE, ALA. March 1, 1915.

Sold to Mr. R. Fitzgerald,

Chicago,

ORDER No.

Ill.

AMBLEY LITHO & ENGRAVING CO., MOBILE, ALA.

Shipped to Magnolia Springs,
c/o M. Frank,

1450	Feet	8"	Drain Tile	85.00	per 1000 feet	123.25
1000	"	6"	"	65.00	" 1000 "	65.00
1		8" X 6"	Y	.65		.65
						<hr/>
						188.90

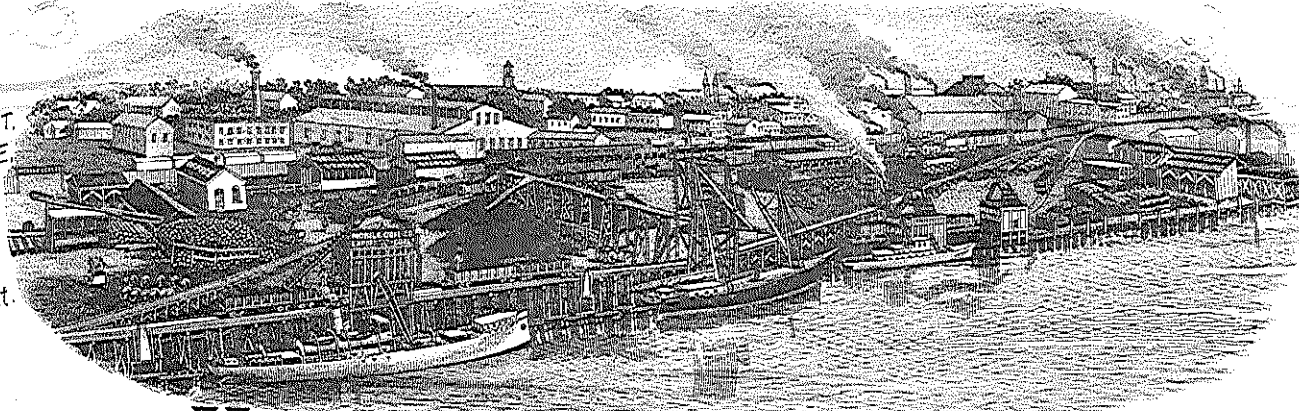
A.C. DANNER, President.

PAUL DANNER, Vice Pres. & Treas.

R.B. SAVAGE, Secretary.

COAL.
COKE, CEMENT,
SEWER PIPE,
LIME.

Shipped to
any Point.



ALABAMA COAL
ALL VARIETIES
COKE
ANTHRACITE COAL
PORTLAND CEMENT
SEWER PIPE

MOBILE COAL COMPANY

MOBILE, ALA. March 16, 1915.

Sold to Mr. R. Fitzgerald,

Chicago,
Ill.

ORDER NO.

Shipped to Magnolia Springs,

c/o M. Frank,

275 Feet 6 " Drain Tile, 65.00 per 1000 feet 17.88

Bay Minette, Ala.,

February 7th, 1916

M

Mobile Coal Company, Corporation, Plaintiff

VS

R. Fitzgerald, Defendant.

ATTACHMENT NOTICE

TO ABNER J. SMITH, PROPR.

THE BALDWIN TIMES

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

To publishing in The Baldwin Times, in
issue of February 3rd, 1916 notice of
above attachment:

178 words @ 1½ cents per word..... \$2.67

Attachment No

The State of Alabama, Baldwin
Court, Spring Term, 1916
Mobile Coal Company, an
corporation, Plaintiff, vs R. Fi
tant. Attachment.

Whereas, Mobile Coal Com
bama Corporation, as Plaintiff, i
obtained an Attachment out of th
the 2nd day of February 1916, i
of the said defendant, R. Fitzger
tachment has been levied upon t
cribed lands, e½ and sw½ of se
c, and also sw¼ less n½ of ne
29, tp 7 s r 3 e, as the property
to-wit: and whereas, it appears
Fitzgerald, Defendant, as afore
resident of the State of Alabi
known place of residence was (

Now, therefore, the said R. F
ever he may reside, is hereby no
and pendency of said Attachme
Witness my hand, this 2nd d
1916.

T. W. Ric

ATTACHMENT NOTICE.

THE STATE OF ALABAMA, No.

Circuit Court.

Baldwin County.

Spring Term, 1916.

Mobile Coal Company, an Alabama,
Corporation.

Plaintiffs.

vs

R. Fitzgerald,

Defendants.

ATTACHMENT.

WHEREAS, Mobile Coal Company an Alabama Corporation
as Plaintiff in said cause, has obtained an Attachment out of this Court, issued the 2nd,
day of February, 1916 against the estate of the said defendant

R. Fitzgerald,

which Attachment has been levied upon the following described lands, E $\frac{1}{4}$ and S.W. $\frac{1}{4}$ of Sec 30 Tp 7.S.
R. 3.E. and also S.W. $\frac{1}{4}$ less N $\frac{1}{2}$ of N.E. $\frac{1}{4}$ of S.W. $\frac{1}{4}$ as the property of said defendant, to-wit:
Sec 29. Tp 7 .S.R.3 E.

and whereas, it appears that the said R. Fitzgerald,
Defendant as aforesaid is a non-resident of the State of Alabama whose last known
place of residence was Chicago Ill,
NOW, THEREFORE, the said
wherever he may reside, is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 2nd, day of February, 1916.

T. M. Richardson Clerk.

No. Page

The State of Alabama,
BALDWIN COUNTY.

CIRCUIT COURT

~~Mobile Coal Company a Corporation.~~

Plaintiffs.

VS

~~R. Fitzgerald.~~

Defendants.

Notice to Non-Residents of Attachment

Issued February 2nd, 1916

~~T. W. Richardson,~~

Clerk

THE STATE OF ALABAMA, Baldwin COUNTY.

Mobile Coal Company an Alabama,

Corporation,

vs.

Plaintiff

R. Fitzgerald,

Defendant

COURT,

1

To R. Fitzgerald,

YOU ARE HEREBY NOTIFIED that a Writ of Attachment, issued by
Mobile Coal Company, an Alabama Corporation
against R. Fitzgerald

for the sum of Two hundred six and 78/100 (\$206.78)

next term of the Circuit Court, to be held for the County of Baldwin Dollars, returnable to the

and State of Alabama, placed in my hands for execution, has been executed by me by levying the same upon
the following property, levied upon as the property of R. Fitzgerald, to-wit

E $\frac{1}{2}$ and S.W. $\frac{1}{4}$ of Sec 30 Tp.7.S. R.3.E and also S.W. $\frac{1}{4}$ less N $\frac{1}{2}$ of N.E. $\frac{1}{4}$
of S.W. $\frac{1}{4}$ Sec 29. Tp 7. S.R. 3. E. containing 620 acres in Baldwin
County, Alabama.

February 2nd, 1916.

Issued

Feb 2

1916

W. E. Eubanks

Sheriff.

THE STATE OF ALABAMA, Baldwin COUNTY.

Mobile Coal Company an Alabama,
Corporation,

vs.

Plaintiff

R. Fitzgerald,

Defendant

COURT,

1

To R. Fitzgerald,

YOU ARE HEREBY NOTIFIED that a Writ of Attachment, issued by

Mobile Coal Company, an Alabama Corporation

against R. Fitzgerald

for the sum of Two hundred six and 78/100 (\$206.78)

Dollars, returnable to the
next term of the Circuit Court, to be held for the County of Baldwinand State of Alabama, placed in my hands for execution, has been executed by me by levying the same upon
the following property, levied upon as the property of R. Fitzgerald, to-wit

E $\frac{1}{2}$ and S.W. $\frac{1}{4}$ of Sec 30 Tp. 7. S. R. 3. E and also S.W. $\frac{1}{4}$ less N $\frac{1}{2}$ of E.E. $\frac{1}{4}$
 of S.W. $\frac{1}{4}$ Sec 29. Tp 7. S.R. 3. E. containing 620 acres in Baldwin
 County, Alabama.

February 2nd, 1916.

Issued

Feb 2

1916

C. C. Eubanks

Sheriff.