

SUMMONS AND COMPLAINT

The State of Alabama {
Baldwin County { No.

Circuit Court

May 11th 1914

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Emma E. West and D. C. West

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 them Defendants

by The Baldwin County Bank, a corporation Plaintiff

Witness my hand this 11th day of May 1914.

T. W. Richmond Clerk.

COMPLAINT

The Baldwin County Bank, Emma E. West and D. C.

a Corporation, Plaintiff Versus West, Defendants.

The plaintiff claims of the defendant

Sixty and 00/100 Dollars due by

promissory waive note made by them on the 24th day of Jan. 1914, and pay
le on Oct. 24th, 1914, with interest thereon. from date.

The plaintiff claims of the defendant the sum of Sixty and 00/100
llars due by promissory waive note made by them on the 24th day of Jan.
14, and payable on July 24th, 1914, with interest thereon from date.

The plaintiff alleges that in and by said instruments the defen-
nts waived their right to exemption allowed under the constitution and
ws of the State of Alabama, which waiver the plaintiff claims the ben-
it thereof.

The plaintiff claims of the defendant the further sum of Fifteen
d 00/100 Dollars as an attorneys fee provided for by said instruments
the default of payment thereof, which sum of money are still due and
paid.

The plaintiff admits a payment of Forty-Five dollars payment up-
said indebtedness.

P A G E & M O O R E R

Plaintiff attorneys

Plaintiff's Attorney.

Original
on (all)

STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT

Levin County
K A Corporation
vs. Plaintiffs

West & B Co
Defendants

NOTICE AND COMPLAINT

May 11 191*0*
Richardson Clerk

Defendant lives at

Plaintiff's Attorney

Defendant's Attorney

James Print, Bay Minette

Received in office

191

Sheriff

I have executed this Writ

this 191

by leaving a copy of the within summons and complaint with

Sheriff

Deputy Sheriff.

State of Alabama, }
Baldwin County

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, The Baldwin County Bank,

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court of said County, against

Emma E. West

for the sum of One Hundred Twenty and 00/100 Dollars and whereas, the said

The Baldwin County Bank

has entered into bond, and made affidavit as required by law, that the said

Emma E. West is indebted to it in the sum of

One Hundred Twenty & 00/100 Dollars, and that process of garnishment is believed to be necessary

to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that Liverpool & London & Globe Insurance Co. is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Liverpool & London & Globe

Insurance Co. to be and appear at the Fall

term of the Circuit Court, to be holden for the County of Baldwin, on to-wit: Nov. 20th 1916,

then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you will not be indebted to him in the future by a contract then existing, and whether by a contract then existing, you are liable to him for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 12th day of May, 1916.

J. W. Richardson

Clerk.

BOND.

State of Alabama, }
Baldwin County }

CIRCUIT COURT.

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, The Baldwin County Bankare held and firmly bound unto Emma E. West and D. C. Westin the sum of Two Hundred Forty and 00/100 DOLLARS,to be paid to the said Emma E. West and D. C. West their

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 11th day of May 1916.

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

The Baldwin County Bank

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court,

to recover of said Emma E. West and D. C. Westthe sum of One Hundred Twenty and 00/100 Dollars,

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

The Liverpool & London & Globe Insurance Co.summoning it to answer what it indebted to said Defendant, or what effects of said Defendant

it 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 they 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.Baldwin County Bank [SEAL]By W. H. Stapleton [SEAL]W. H. Stapleton [SEAL]Approved this 11 day of May A. D., 1916T. W. Rice Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Henry D. Moorer a Notary
Before me, ~~T. W. RICHMOND~~, Clerk of Circuit Court,

Public
In and for said County, personally appeared W. D. Stapleton cashier of the Baldwin
County Bank

who, being duly sworn, doth depose..... and say..... that.....

Emma E. West and D. C. West are

indebted to it in the sum of One Hundred Twenty and 00/100 Dollars,
and that it has commenced on suit by summons and complaint on said indebtedness against the said

Emma E. West and D. C. West

and that.....

The Liverpool & London & Globe Insurance Co.

supposed to be indebted to the said Defendant S., or to have effects of the said Defendant S., in its
possession, or under its control, and that he believe that process of Garnishment against the said

Emma E. West and D. C. West

is necessary to obtain satisfaction of said claim; and that the said Liverpool & London & Globe Insur-
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 S., or other improper motives.

Sworn to and subscribed before me this 11th day of May 1916.

T. W. Richmond Clerk Circuit Court.

No.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT

Baldwin County Bank
A Corporation.

Plaintiff.....

TO

D. C. West.

Defendant.....

Bond and Affidavit in Garnishment on Summons

Filed this 11th day of May 1916.

T. W. Richmond Clerk.

The State of Alabama { No. _____
Baldwin County

Circuit Court

May 11 191*8*

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Emma E. West and D. C. West

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 them Defendants

by The Baldwin County Bank, corporation Plaintiff

Witness my hand this 11th day of May 1918.
T. W. Richmond Clerk.

COMPLAINT

The Baldwin County Bank, Emma E. West and D. C.
a Corporation, Plaintiff Versus West, Defendants.
The plaintiff claims of the defendant

Sixty and 00/100 Dollars due by

promissory waive note made by them on the 24th day of Jan. 1914, and pay able on Oct. 24th, 1914, with interest thereon. from date.

The plaintiff claims of the defendant the sum of Sixty and 00/100 Dollars due by promissory waive note made by them on the 24th day of Jan. 1914, and payable on July 24th, 1914, with interest thereon from date.

The plaintiff alleges that in and by said instruments the defendants waived their right to exemption allowed under the constitution and laws of the State of Alabama, which waiver the plaintiff claims the benefit thereof.

The plaintiff claims of the defendant the further sum of Fifteen and 00/100 Dollars as an attorneys fee provided for by said instruments in the default of payment thereof, which sum of money are still due and unpaid.

The plaintiff admits a payment of Forty-Five dollars payment up-on said indebtedness.

P A G E & M O O R E R

Plaintiff Attorneys

Plaintiff's Attorney.

The State of Alabama {
Baldwin County { No. _____

Circuit Court

May 191*6*

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon _____

Emma E. West and D. C. West

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 _____ Defendant _____

by *them* *S*
The Baldwin County Bank, a corporation Plaintiff

Witness my hand this _____ day of _____ 191*6*

11th *May* *G.*
For Clerk.

COMPLAINT

The Baldwin County Bank, Plaintiff Versus *Emma E. West and D. C.*
a Corporation, claims of the defendant *West, Defendants.*

Sixty and 00/100 Dollars due by

promissory waive note made by them on the 24th day of Jan. 1914, and pay
able on Oct. 24th, 1914, with interest thereon. from date.

The plaintiff claims of the defendant the sum of *Sixty and 00/100*
Dollars due by promissory waive note made by them on the 24th day of Jan.
1914, and payable on July 24th, 1914, with interest thereon from date.

The plaintiff alleges that in and by said instruments the defen-
dants waived their right to exemption allowed under the constitution and
laws of the State of Alabama, which waiver the plaintiff claims the ben-
efit thereof.

The plaintiff claims of the defendant the further sum of *Fifteen*
and *00/100* Dollars as an attorneys fee provided for by said instruments
in the default of payment thereof, which sum of money are still due and
unpaid.

The plaintiff admits a payment of *Forty-Five* dollars payment up-
on said indebtedness.

PAGE & MOORE

Plaintiff attorneys

Plaintiff's Attorney.

State of Alabama, }
Baldwin County

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, The Baldwin County Bank, a corporation

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court of said County, against

Emma E. West and D. C. West

for the sum of One Hundred Twenty and 00/100 Dollars and whereas, the said

The Baldwin County Bank, corporation

has entered into bond, and made affidavit as required by law, that the said Emma E. West and

D. C. West is indebted to it in the sum of

One Hundred Twenty and 00/100 Dollars, and that process of garnishment is believed to be necessary

to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that The Liverpool & London &

Globe Insurance Co., W. D. Stapleton agent is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Liverpool & London & Globe

Insurance Co., W. D. Stapleton agent to be and appear at the Fall

term of the Circuit Court, to be holden for the County of Baldwin, on to-wit; November 20th 1916,

then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your

answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted

to the defendant, and whether, you will not be indebted to him in the future by a contract then existing, and whether by a

contract then existing, you are liable to him for the delivery of personal property, or for the payment of money which may

be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in

your possession or under your control money or effects belonging to the defendant.

Witness my hand this 11th day of May, 1916

J. W. Richardson

Clerk.

No. _____

Bellevue

VS. } Garnishment on Summons

DC sent ✓
EE sent

Issued 11 day of May 1918

Plff's Attorney.

DALDWIN TIMES PRINT.

Executed May 11th 1916 By receiving
a copy of the within instrument
on A D Stapleton cashier of the Balance
Co Bank

124 Eastbank Street
Dorchester