

DAN CARGAL,
Plaintiff,

vs-

WILLIAM H. MORFORD,
Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) NO. 4544

The Plaintiff claims of the Defendant \$1300.00, due by promissory note made by him to-wit, July, 1960, and payable 30 days thereafter, with interest thereon. Plaintiff further claims the sum of \$260.00 as a reasonable Attorneys fee, averring said fee to be reasonable, which said fee is provided for by the terms of said note. Plaintiff further states that the defendant waived all right of exemption under the constitution and laws of Alabama or any other State, by the terms of said note.

MATRANGA & STOKES,

BY: B. F. Helson, III

ATTORNEY FOR PLAINTIFF

Serve the Defendant at Rt. 1, Daphne, Alabama

FILED

JAN 11 1961

ALICE I. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4544

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon WILLIAM H. MORFORD

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

WILLIAM H. MORFORD, Defendant.

by DAN CARGAL

Plaintiff.

Witness my hand this 11 day of January 1961.

Ed 1-19-61

W. J. Luck, Clerk

No. 4544

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

DAN CARGAL

Plaintiffs

vs.

WILLIAM H. MOREORD

Defendants

Summons and Complaint

Filed January 11, 1961

Alice J. Duck Clerk

B.F. Stokes, III

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

241 Oaktree

Received In Office

1/14, 1961

Sheriff.

I have executed this summons

this 19 Jan 1961
by leaving a copy with

William H. Moreord

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY T. W. Wilkins
DEPUTY SHERIFF

Sheriff.

Taylor Wilkins

W. C. Garner

Deputy Sheriff.

Diaphane

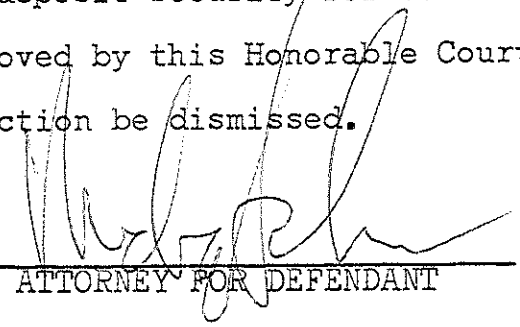
DAN CARGAL,	(	IN THE CIRCUIT COURT OF
	(	
Plaintiff,	(	BALDWIN COUNTY, ALABAMA
	(	
vs.	(	AT LAW
	(	
WILLIAM H. MORFORD,	(	
	(	
Defendant.	(	NO. 4544

MOTION TO REQUIRE PLAINTIFF TO DEPOSIT COSTS

Comes now the Defendant, William H. Morford and shows unto the Court as follows:

The Plaintiff, Dan Cargal, is a non-resident of this state.

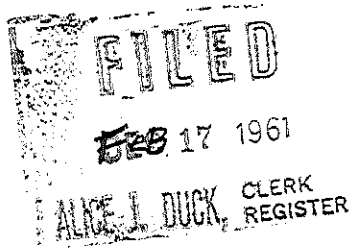
WHEREFORE, the Defendant moves that this Honorable Court require the Plaintiff to deposit security for costs in such amount and form as approved by this Honorable Court or failing the same that this action be dismissed.



ATTORNEY FOR DEFENDANT

Plaintiff may be served through his attorney:

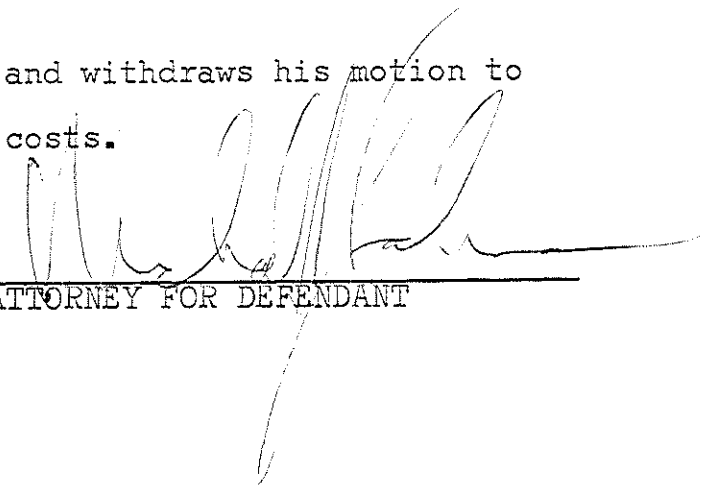
Hon. Ben Stokes
Van Antwerp Building
Mobile, Alabama



DAN CARGAL,
Plaintiff,
vs.
WILLIAM H. MORFORD,
Defendant.

(IN THE CIRCUIT COURT OF
(
(BALDWIN COUNTY, ALABAMA
(
(AT LAW
(
(
(NO. 4544

Comes now the Defendant and withdraws his motion to
require Plaintiff to deposit costs.



ATTORNEY FOR DEFENDANT

FILED

FEB 28 1967

WILLIAM L. DUCK, CLERK
REGISTER

APPEARANCE

BALDWIN

State of Alabama -- = ~~Mobile~~ County

CIRCUIT COURT --- CIVIL DIVISION

Dan Cargal,

Plaintiff

vs

William H. Morford,

Defendant.

CASE NO. 4544

Bay Minette,

~~Mobile~~, Ala., February 15 19 61.

Michael J. Salmon appear for

William H. Morford Defendants

in the above entitled cause and reserve the right to demur or plead specially.

Defendant respectfully demands trial by jury.

Filed 2-17, 19 61

Michael J. Salmon
Attorney for Defendant

Archie H. Hensley
Clerk

217

VINCENT F. KILBORN

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

TELEPHONE HEMLOCK 2-2635

CABLE ADDRESS: VEEKAY

VINCENT F. KILBORN

MICHAEL J. SALMON

BENJAMIN H. KILBORN

WILLIS C. DARBY, JR.

ABRAHAM A. MITCHELL

February 27, 1961

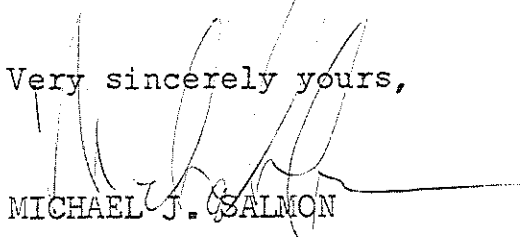
Mrs. Alice Duck
Register, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Dear Mrs. Duck:

RE: Cargal vs. Morford, No. 4544, At Law

I enclose a motion withdrawing an earlier motion I
had filed for security for costs which I would thank you
to file for me.

Very sincerely yours,


MICHAEL J. SALMON

MJS:nc

Enclosure

VINCENT F. KILBORN

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

VINCENT F. KILBORN

TELEPHONE HEMLOCK 2-2635

CABLE ADDRESS: VEEKAY

MICHAEL J. SALMON
BENJAMIN H. KILBORN
WILLIS C. DARBY, JR.
ABRAHAM A. MITCHELL

February 16, 1961

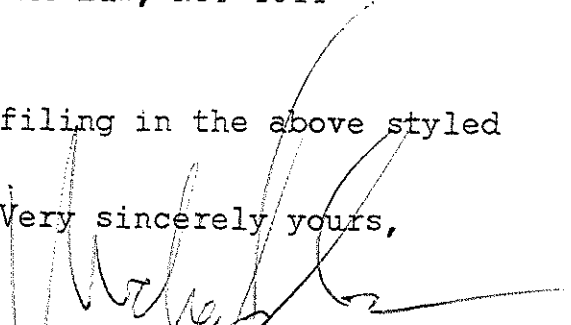
Mrs. Alice J. Duck
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

RE: Dan Cargal v. William H. Morford
Circuit Court, At Law, No. 4544

Dear Mrs. Duck:

I enclose a motion for filing in the above styled case.

Very sincerely yours,


MICHAEL J. SALMON

MJS:nc

Enclosure

DAN CARGAL,

Plaintiff

vs:

WILLIAM H. MORFORD,

Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW.

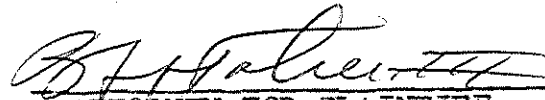
)

)

) CASE NO. 4544

MOTION FOR ISSUANCE OF A WRIT OF DISCOVERY

Comes now the Plaintiff in the above styled cause and states
unto the Court that the Judgment heretofore rendered in this
cause, ¹⁵unsatisfied and Plaintiff moves this Honorable Court to issue
unto the defendant a writ of discovery, requiring him to file
in Court a sworn list of his assets and liabilities.


ATTORNEY FOR PLAINTIFF

Serve the Defendant at Rt. 1, Daphne, Alabama.

MATRANGA & STOKES
ATTORNEYS AT LAW
308-309 VAN ANTWERP BUILDING
MOBILE, ALABAMA

JOSEPH M. MATRANGA
BEN F. STOKES, III

May 21, 1962

P. O. BOX 293
TELEPHONE HE 3-1634

Mrs. Alice J. Duck, Register
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Dan Cargal vs: William H. Morford, Case No. 4544

Dear Mrs. Duck:

Please file for record the enclosed motion for a writ
of discovery. I would also appreciate your issuing this
writ of discovery at your earliest opportunity.

Sincerely yours,


B. F. STOKES, III

BFS/pl

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 4544

Defendant.

WILLIAM H. MORFORD,

VS:

Plaintiff,

DAN CARGAL,

NOTICE TO DEFENDANT

TO: William H. Morford, Defendant.

Take notice that upon the written request of B.F. Stokes, III,

Attorney for Plaintiff, filed in this Court in this cause, you are

commanded to file in this Court within thirty days from the service of

this notice, a statement in writing, under oath, of all of your assets,

including money, choses in action, notes, bonds, and accounts, and all

other property, real, personal or mixed or any interest therein, with

a detailed description of same, the location and reasonable value of

each item thereof, together with a detailed list or statement of any

and all liens, mortgages, or incumbrances thereon showing the amounts

due upon each, and the owner or holder of such liens, incumbrances

or mortgages.

Be governed accordingly.

Dated this 14 day of May, 1962.

James F. Burke
Clerk of the Circuit Court.

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA, GREETING:

You are hereby commanded to serve the foregoing notice upon William

H. Morford, Defendant, and make due return of your said service and of

this notice, within thirty days from this date, now you have executed

the same.

WITNESS my hand this 14 day of May, 1962.

James F. Burke
Clerk.

DAN CARGAL,
Plaintiff,

vs:

WILLIAM H. MORFORD,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LZW, CASE NO. 4544

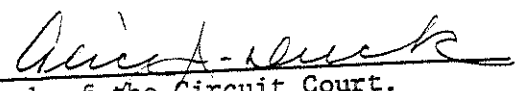
NOTICE TO DEFENDANT

TO: William H. Morford, Defendant.

Take notice that upon the written request of B.F. Stokes, III, Attorney for Plaintiff, filed in this Court in this cause, you are commanded to file in this Court within thirty days from the service of this notice, a statement in writing, under oath, of all of your assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal or mixed or any interest therein, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages, or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

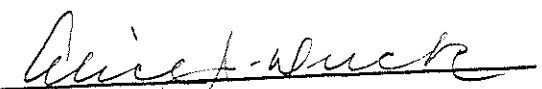
Dated this 24 day of May, 1962.


Clerk of the Circuit Court.

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA, GREETING:

You are hereby commanded to serve the foregoing notice upon William H. Morford, Defendant, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

WITNESS my hand this 24 day of May, 1962.


Clerk.

P. 219-B

No. 4544

Sam Cargal

vs.

William H. Morford
Pl. Daphne Ala

Recovery of assets

Received 24 day of May 1962
and on 19 day of June 1962
served a copy of the within Process
on William H. Morford

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Returned 17 day of June 1962
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By W. C. Danner Deputy Sheriff

P. 219-A

filed
5-11-62
Angela
Claus

Serve the Defendant at Rt. 1, Daphne, Alabama.

ATTORNEY FOR PLAINTIFF

B. T. Holm

Comes now the Plaintiff in the above styled cause and states
unto the Court that the Judgment heretofore rendered in this
cause unsatisfied and Plaintiff moves this Honorable Court to issue
unto the defendant a writ of discovery, requiring him to file
in Court a sworn list of his assets and liabilities.

MOTION FOR ISSUANCE OF A WRIT OF DISCOVERY

DAN CARGAL,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs:	)	AT LAW.
WILLIAM H. MORFORD,	)	
Defendant.	)	
	)	CASE NO. 4544