

C I R C U I T C O U R T

STATE OF ALABAMA X
BALDWIN COUNTY X

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summons Harold Julian Siegel to appear within thirty (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of Hershall Kirkpatrick.

Witness my hand, this 2 day of May, 1962.

Reice J. Smith
CLERK.

Not

* * * * *

HERSHALL KIRKPATRICK,	<u>C O M P L A I N T</u>	IN THE CIRCUIT COURT OF
PLAINTIFF.	X	BALDWIN COUNTY, ALABAMA.
vs.	X	AT LAW.
HAROLD JULIAN SIEGEL,	X	NUMBER: <u>5126</u> .
DEFENDANT.	X	

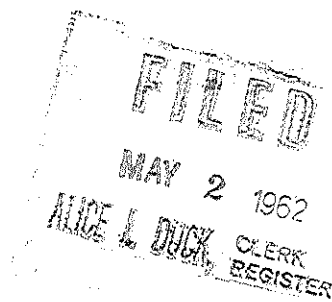
COUNT ONE.

The plaintiff claims of the defendant the sum of One Thousand and No/100 (\$1,000.00) Dollars, as damages for that heretofore on, to-wit: April 28, 1962, the plaintiff's automobile was being operated along and upon a public highway, to-wit; U. S. Highway Number 31 at a point on said public highway between Mark Avenue and Dennis Avenue within the municipal limits of the City of Bay Minette, Baldwin County, Alabama, where plaintiff's automobile had a right to be and while said automobile was being operated and driven along the said public highway an automobile which was being driven by the defendant ran upon, over or against the automobile of the plaintiff causing great damages and injuries to the plaintiff's automobile in this: The left front fender, hood, left front wheel, motor, bumper, headlight and other parts of plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the plaintiff as aforesaid. The

plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the defendant, in that defendant negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the plaintiff as a proximate consequence thereof, the plaintiff's automobile was damaged and injured as aforesaid.

HORNE, WEBB & TUCKER
BY:


J. R. Tucker



No. 512-6

Marshall Kirkpatrick

vs.

Harold Julian Siegel

Returned 11 day of May 1962
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By W. A. Talbert
Deputy Sheriff

Received 2 day of May 1962
and on _____ day of _____ 19____

I served a copy of the within for
on Harold Julian
Siegel

By service on _____

TAYLOR WILKINS, Sheriff
By _____ D.

FILED
MAY 2 1962
ALICE J. DUCK, CLERK
REGISTER

C I R C U I T C O U R T

STATE OF ALABAMA X
BALDWIN COUNTY X

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summons Harold Julian Siegel to appear within thirty (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of Hershall Kirkpatrick.

Witness my hand, this 7 day of May, 1962.

W. H. H. H.
CLERK.

* * * * *

HERSHALL KIRKPATRICK,
PLAINTIFF.
VS.
HAROLD JULIAN SIEGEL,
DEFENDANT.

C O M P L A I N T
I
I
I
I
I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
NUMBER: 519-6.

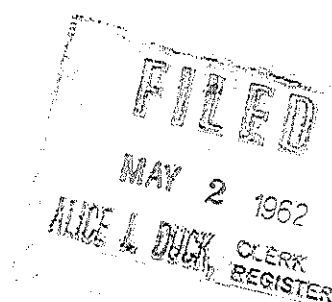
COUNT ONE.

The plaintiff claims of the defendant the sum of One Thousand and No/100 (\$1,000.00) Dollars, as damages for that heretofore on, to-wit: April 28, 1962, the plaintiff's automobile was being operated along and upon a public highway, to-wit; U. S. Highway Number 31 at a point on said public highway between Mark Avenue and Dennis Avenue within the municipal limits of the City of Bay Minette, Baldwin County, Alabama, where plaintiff's automobile had a right to be and while said automobile was being operated and driven along the said public highway an automobile which was being driven by the defendant ran upon, over or against the automobile of the plaintiff causing great damages and injuries to the plaintiff's automobile in this: The left front fender, hood, left front wheel, motor, bumper, headlight and other parts of plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the plaintiff as aforesaid. The

plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the defendant, in that defendant negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the plaintiff as a proximate consequence thereof, the plaintiff's automobile was damaged and injured as aforesaid.

HORNE, WEBB & TUCKER
BY:

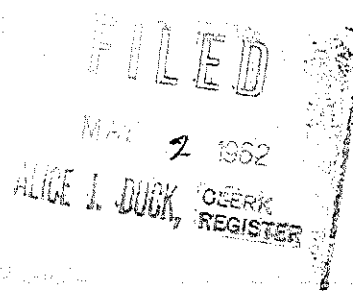

J. R. Tucker



plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the defendant, in that defendant negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the plaintiff and as a proximate consequence thereof, the plaintiff's automobile was damaged and injured as aforesaid.

HORNE, WEBB & TUCKER
BY:

J. R. Tucker
J. R. Tucker



Law Offices of
Horne, Webb & Tucker

Attorneys at Law
Atmore, Ala.

May 1, 1962

FRANK G. HORNE
DOUGLAS S. WEBB
J. R. TUCKER

TELEPHONE 368-3199

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

Dear Mrs. Duck:

Enclosed find the following papers in the matter of Hershall Kirkpatrick vs. Harold Julian Siegel:

1. Original and copy of Summons and Complaint.
2. Attachment Affidavit.
3. Original and copy of Attachment Writ.

We understand that the automobile belonging to the Defendant is in a garage at Bay Minette, Alabama.

Very truly yours,

HORNE, WEBB & TUCKER

BY:  J. R. TUCKER

JRT/vje

Encl.

The Defendant being a non-resident of the State of Alabama the Plaintiff elects not to give bond as provided by law.

Horne, Webb & Tucker

by:

Attorneys for Plaintiff.

Attachment Writ.

THE STATE OF ALABAMA

ESCAMBIA COUNTY

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

Whereas, Hershall Kirkpatrick hath
complained, on oath, to me, Alice J. Duck Baldwin
~~xxxvickxxx~~, Clerk, of the Circuit Court of ~~Escambia~~ County that
Harold Julian Siegel is Justly
indebted to Hershall Kirkpatrick

in the sum of One Thousand and No/100 (\$1,000.00)----- Dollars,
defendant being a non-resident of the State
and plaintiff having made affidavit and/~~xxx bond as required by law in such cases~~ of Alabama
Plaintiff not being required to give bond

You are hereby commanded to attach so much of the estate of the said Harold Julian Siegel
as shall be of value sufficient to satisfy the said debts and costs according to complaint, and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the next term of the Circuit Court, for the County of ~~Escambia~~ Baldwin, to be held at the court house thereof, when and where you shall make known to said Court how you have executed this writ.

Witness, this 2 day of May 1962.

Alice J. Duck, Clerk

Ed-5-2-62-

Attached one 1961 Corvair Monza
Deft. Not Found

no 5126

THE STATE OF ALABAMA,
ESCAMBIA COUNTY

CIRCUIT COURT

Hershall Kirkpatrick

Plaintiff.

vs.

Harold Julian Siegel

Defendant

ATTACHMENT WRIT

Issued this 2 day
of May 1962
Reine Fleuch, Clerk

Received this 2 day
of May 1962, by

Sheriff.

Executed this _____ day
of _____ 19____, by
levying this writ.

Sheriff.

Defendant being a non-resident of the State of Alabama the Plaintiff
lects not to give bond as provided by law.

Attachment Writ.

Horne, Webb & Tucker

by:

J.R. Tucker

Attorneys for Plaintiff.

THE STATE OF ALABAMA

ESCAMBIA COUNTY

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

Whereas, Hershall Kirkpatrick hath
complained, on oath, to me, Alice J. Duck
~~J.E. WICKERY~~, Clerk, of the Circuit Court of Baldwin
Escambia County that Harold Julian Siegel
is Justly
indebted to Hershall Kirkpatrick

in the sum of One Thousand and No/100 (\$1,000.00) Dollars,
and plaintiff having made affidavit and defendant being a non-resident of the State
Plaintiff not being required to give bond given bond as required by law in such cases: of Alabama
You are hereby commanded to attach so much of the estate of the said Harold Julian
Siegel as shall be of value sufficient to satisfy the said debts and costs ac-
cording to complaint, and such estate, unless replevied, so to secure that the same may be liable to further
proceedings thereon, to be had at the next term of the Circuit Court, for the County of Baldwin
Escambia, to be
held at the court house thereof, when and where you shall make known to said Court how you have exe-
cuted this writ.

Witness, this 2 day of May 1962.

Alice J. Duck, Clerk

Legs Wilkins
W. A. Talbot Sheriff.

The State of Alabama, _____ County

CIRCUIT COURT AT _____ ALA.

Know all Men by These Presents, That we, _____

_____, of the County of _____

are held and firmly bound unto _____

in the sum of _____ Dollars,

to be paid to the said _____

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 and severally, firmly by these presents.

Sealed with our seals and dated the _____ day of _____, 19____

The Condition of this Obligation is such:

That whereas, the above bounded, _____

_____ ha _____, on the day of the date hereof, prayed an Attachment at the suit of _____

_____ against the estate of the above named _____

for the sum of _____ Dollars,

and hath obtained the same, returnable to the Circuit Court of _____ County.

Now, if the said _____

should prosecute said Attachment to effect, and pay the said Defendant all such damages as _____

may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be void;

otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now, or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, sealed, and delivered the day above written.

(Seal.)

(Seal.)

(Seal.)

(Seal.)

Approved this _____ day of _____, 19____

Code 1940, Title 7, Sec. 857.

_____, Clerk.

The State of Alabama, Baldwin County

CIRCUIT COURT AT Bay Minette ALABAMA

B. —0—

Before me, Mary/Jernigan a Notary Public

in and for said County, personally appeared Hershall Kirkpatrick

who, being duly sworn, on oath saith that Harold Julian Siegel

_____ is _____ justly indebted to
the said Hershall Kirkpatrick

in the sum of One Thousand and No/100 (\$1,000.00) ----- Dollars.

which said amount is justly due after allowing all just offsets and discounts, and that the said Harold Julian Siegel is a non-resident of the State of Alabama

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

Subscribed and sworn to before me this 30th day of April, 1962

Code 1940, Tit. 7, Sec. 850.

My Commission Expires Nov. 1, 1968

The Plaintiff elects to sue out the writ of attachment without giving bond.

HORNE, WEBB & TUCKER

BY:

ATTORNEYS FOR PLAINTIFF.

No. _____
The State of Alabama,
County, _____
At _____ Ala.
CIRCUIT COURT
TO
Attachment Bond and Affidavit
Filed this the _____ day of _____, 19____,
Clerk, _____
Attorney.
Advance Printing Co., Atmore, Ala.