

ERNEST M. BAILEY  
ATTORNEY AT LAW  
221 FAIRHOPE AVE.  
FAIRHOPE, ALABAMA

BOX 161

May 1st, 1964

Mrs. Alice Duck  
Circuit Clerk  
Bay Minette, Alabama

Re: Case # 5253

Dear Mrs. Duck:

Please have the attached garnishment served  
on garnishee, Standard Furniture Co., Inc. of  
Bay Minette, Alabama.

Thanking you in advance, I am

Very truly yours,

*Ernest M. Bailey*  
Ernest M. Bailey

EMB/w

Incl:

STATE OF ALABAMA )  
BALDWIN COUNTY )

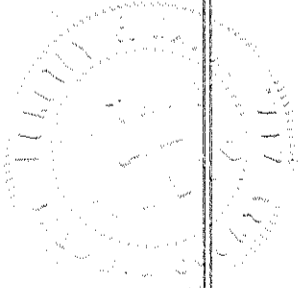
AFFIDAVIT

Before me, a Notary Public in and for said State and County, personally appeared Wilburn L. Odom, Assistant Vice President and Loan Officer of the Bank of Fairhope, who, being duly sworn, deposes and says that; George A. Henderson, Jr. is indebted to the said Bank of Fairhope in the sum of Two Hundred thirty-seven and 25/100 (\$237.25.) Dollars for which he has commenced a suit against the said George A. Henderson, Jr. by Summons and Complaint in the Circuit Court of Baldwin County, Alabama, returnable on the \_\_\_\_\_ day of \_\_\_\_\_, 1962, and that he believes that process of garnishment against Woodhaven Dairies, Inc. is necessary to obtain satisfaction of said indebtedness, and that said Woodhaven Dairies, Inc. is supposed to be indebted to said defendant, or has effects of said defendant in his possession or under his control.

Subscribed and sworn to before me this 22 day of August, 1962.

Wilburn L. Odom  
WILBURN L. ODOM, Assistant Vice-President, & Loan Officer of the Bank of Fairhope.

Dorothy J. Kame  
NOTARY PUBLIC



FILED

AUG 24 1962

AUDIE J. DUCK, CLERK REGISTER

BANK OF FAIRHOPE, A State Banking Corporation,  
 Plaintiff  
 VS.  
 GEORGE A. HENDERSON, JR.,  
 Defendant

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 AT LAW

Plaintiff claims of the defendant the sum of One Hundred Ninety-seven and 71/100 (\$197.71) Dollars with interest thereon, due from the defendant by promissory note executed under seal by him on, to-wit, October 23, 1959 in the principal amount of \$268.23 due and payable on to-wit, August 5, 1960; that the Defendant defaulted in the payment of said note on, to-wit, March 5th, 1960, and under the terms of said note the entire outstanding balance, to-wit, the sum of One Hundred Ninety-seven and 71/100 (\$197.71) Dollars became immediately due and payable; The Plaintiff further claims interest on the said unpaid balance, to-wit, the sum of \$197.71, at the rate of six (6%) percent per annum from said date of default; That under the terms of said note the defendant agreed to pay all cost of collection and the Plaintiff further claims an Attorneys fee in the amount of twenty (20%) percent of the said unpaid balance, to-wit, \$197.71; that under the terms of said note the Defendant waives all exemptions under the laws of any State and Plaintiff respectfully claims benefit from said waiver.

BAILEY & LACEY  
 BY: Richard L. Lacey  
 ATTORNEYS FOR PLAINTIFF

FILED

AUG 24 1962

ALICE J. DUCK, REG. STENOGRAPHER

Received 24 day of Aug 1962  
 and on 6 day of Sept 1962  
 I served a copy of the within etc  
 on George A. Henderson, Jr.  
 By service on \_\_\_\_\_

Sheriff claims 50 miles at  
 Ten Cents per mile Total \$ 5.00  
 TAYLOR WILKINS, Sheriff  
 BY CC DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff  
 By R. D. Dade D. S. 220

CIRCUIT COURT, BALDWIN COUNTY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. ....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GEORGE A. HENDERSON, JR.

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 \_\_\_\_\_

George A. Henderson, Jr., Defendant .....

by \_\_\_\_\_

Bank of Fairhope, Plaintiff .....

Witness my hand this 24 day of Aug 1962

*Allice J. Rusk* Clerk

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Bank of FAIRHOPE, A State

Banking Corporation

Plaintiffs

vs.

GEORGE A. HENDERSON, Jr

*Daphne*

Defendants

SUMMONS and COMPLAINT

Filed 8-24-62, 19.....

Alice J. Duck  
Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

State of Alabama

BALDWIN COUNTY

TO GEORGE A. HENDERSON, JR., Defendant.....:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of.....

BANK OF FAIRHOPE, Plaintiff.....,

versus GEORGE A. HENDERSON, JR., Defendant.....,

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which.....

WOODHAVEN DAIRIES, INC.

has... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 24.....

day of Aug, 1946.....

*Alice J. ...*  
Clerk of the Circuit Court.

225

*Est-9-6-62*

5253

NOTICE  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA  
TO

Bank of Fairhope

Plaintiff.....

VS.

George A. Henderson, Jr.

Defendant.....

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

Received 24 day of Aug 1962  
and on 6 day of Sept 1962  
I served a copy of the within Notice  
on George A. Henderson, Jr.

My service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By [Signature] D. S.

[Signature]  
R. D. [Signature]

FIRST NATIONAL BANK OF  
FAIRHOPE, ALABAMA, a  
Corporation

Plaintiff

VS

GEORGE A. HENDERSON, JR.

Defendant

STANDARD FURNITURE COMPANY,  
a Corporation

Garnishee

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 5253 1/4

ANSWER OF GARNISHEE

Comes now Standard Furniture Company, a Corporation, the  
Garnishee named in the above styled cause, and for answer to the  
writ of garnishment in the said cause dated May 4, 1964 says:

1. The Defendant is employed by it as a mirror builder  
and is paid on an hourly basis.

2. At the time of the service of the garnishment and  
at the time of making this answer the Garnishee is indebted to  
the said George A. Henderson, Jr., in the amount of \$ ~~54.00~~ 54.00.

3. The Garnishee expects to be indebted to the Defendant  
in the above styled cause in the future for wages earned on an  
hourly basis.

Garnishee prays leave of the Court to deduct and remit  
the sum of \$7.50 per week from the Defendant's wages.

Standard Furniture Company  
a Corporation

By: *R. M. Hodgson*

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said  
County and State personally appeared R. M. Hodgson,  
who, as being by me first duly and legally sworn, deposes and says:  
That he is Secretary-Treasurer of Standard Furniture Company,  
a Corporation; that he has read the above and foregoing instrument,  
and that the facts stated therein are true.

Sworn to and subscribed before me this the 27<sup>th</sup> day of

May, 1964.

**FILED**

MAY 28 1964

13 *Marion C. Bryan*  
Notary Public,



The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular January Term, 1963, of the Circuit Court of Baldwin County,  
to-wit: On the 31st day of January, 1963, being a regular day of  
said term, The First National Bank of Fairhope, Alabama

recovered judgment against George A. Henderson, Jr.

for the sum of Two Hundred Fifty and 11/100 Dollars, and cost of suit,  
and affidavit having been made by Ernest M. Bailey  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

Standard Furniture Company of Bay Minette, Alabama

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant or that it is, or  
is believed to be indebted to said defendant or to be liable to them, or to one of them on a  
contract for the delivery of personal property, or on a contract for the payment of money which may be  
discharged by the delivery of personal property, or which is payable in personal property.

You Are Therefore Hereby Commanded to Summon Standard Furniture Company,  
Inc.

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House  
thereof, in the city of Bay Minette, on the thirty days from date Monday in          A. D. 19        ,  
then and there within the three first days of the term, to answer on oath, whether at the time of the service  
of the garnishment, or at the time making its answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer it was          indebted to said defendant  
         and whether it will not be indebted in future to said defendant  
         by a contract then existing, and whether by a contract then existing it  
is, or are, liable to said defendants 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 it has not in its possession or under its control money or  
effects belonging to the defendant, George A. Henderson, Jr.

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 4 day of May, A. D., 1964

Issued 4 day of May, A. D., 1964

EX-5-4-64

ATTEST:

Alice J. Duck, Clerk.

Received 4 day of May 1964  
and on 4 day of May 1964  
served a copy of the within Subpoena  
on Standard Furniture  
Co.  
by service on ms. Jaze

TAYLOR WILKINS, Sheriff  
By W. G. Talbot, Sr.  
om

Circuit Court, Baldwin County

No. 5253 1/2

First National Bank  
of Jacksonville

VS. } Garnishment On Judgment

George L. Henderson, Jr.

Standard Furniture Co.

Issued 4 day of May 1964

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

E. M. Bailey  
Attorney

52534

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid Ernest M. Bailey

who being duly sworn, on oath says, that a regular January 1963 Term

of the Circuit Court of Baldwin County, to-wit: on the 31st day of January

19 31, The First National Bank of Fairhope, Alabama

recovered a judgment against George A. Henderson, Jr.,

for the sum of

Two Hundred Fifty and 11/100 Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

Standard Furniture Company, Inc., of Bay Minette, Alabama

supposed to be indebted to or have effects of the said George A. Henderson, Jr.,

in its possession, or under its control, and that he believes process of

Garnishment against said Standard Furniture Company, Inc.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 1st

day of May A. D. 19 64

*Ernest M. Bailey*

*Beth J. W. W. J.*  
*Notary Public*

Clerk

State of Alabama

BALDWIN COUNTY

TO George A. Henderson, Jr., Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

The First National Bank of Fairhope, Alabama, Plaintiff,

versus George A. Henderson, Jr., Defendant,

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which Standard

Furniture Company, Inc., of Bay Minette, Alabama

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 4

day of May, 1964

EX-5-4-64

Alice J. [Signature] Clerk of the Circuit Court.

5253 1/2

ceived 4 day of May 1964  
d on 4 day of May 1964  
served a copy of the within Petition  
George Handman Jr.

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. G. Talbert D. S.  
omi

**NOTICE  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA**

TO

George A. Handman Jr.

First National Bank of  
Tombigbee

Plaintiff.....

VS.

George A. Handman Jr.

Defendant.....

*[Handwritten notes, possibly "George Handman Jr."]*

*[Vertical handwritten text, possibly "George Handman Jr."]*

*[Vertical text, possibly "BALDWIN COUNTY, ALABAMA"]*

*[Vertical text, possibly "BALDWIN COUNTY, ALABAMA"]*

*[Vertical text, possibly "BALDWIN COUNTY, ALABAMA"]*

STATE OF ALABAMA )  
BALDWIN COUNTY )

BOND ON SUMMONS AND COMPLAINT

KNOW ALL MEN BY THESE PRESENTS, that the Bank of Fairhope, Fairhope, Alabama, is held and firmly bound unto George A. Henderson, Jr. in the sum of Two Hundred Thirty-seven and 25/100 (\$237.25) Dollars, for the payment of which, well and truly to be made, it binds itself, its successors and assigns,

IN WITNESS WHEREOF, the said Bank of Fairhope has hereunto set its hand and seal, by its President, Henry G. Bishop and its Vice-President, John Beasley, this the 23<sup>rd</sup> day of August, 1962.

The condition of the above obligation is such, that whereas, the above bound Bank of Fairhope has commenced suit in the Circuit Court of Baldwin County, Alabama by Summons and Complaint, to recover of said George A. Henderson, Jr. in the sum of Two Hundred Thirty-seven and 25/100 (\$237.25) Dollars, and has on the day of the date thereof prayed that writ of garnishment issue to Woodhaven Dairies, Inc. to answer what its indebtedness to, or what effects of defendant it has in its possession or under its control, and said Plaintiff having made oath and entered into this bond, as required by law in such cases, has obtained said writ of garnishment, returnable to the Circuit Court of Baldwin County, Alabama.

Now if the said Plaintiff shall prosecute its suit to effect and pay the defendant all such damages as he may sustain from the wrongful or vexatious suing out of said garnishment, then this obligation shall be null and void, otherwise to remain in full force and effect.

BANK OF FAIRHOPE, A State Banking Corporation,

By: Henry G. Bishop  
Henry G. Bishop, President

ATTEST:

John M. Beasley  
John Beasley, Vice President

Approved this 24 day of August, 1962.

Alvin J. Smith

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, Bank of Fairhope, a State Banking Corporation

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court  
of said County, against George A. Henderson, Jr.

for the sum of Two Hundred Thirty-seven and 25/100 Dollars and whereas, the said  
Bank of Fairhope

has entered into bond, and made affidavit by law that the said George A. Henderson, Jr.

is indebted to Bank of Fairhope in the sum of \$237.25.

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 Woodhaven Dairies, Inc.

\_\_\_\_\_ is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Woodhaven Dairies, Inc.

\_\_\_\_\_ to be and appear at the \_\_\_\_\_ term of the Circuit Court, to

be holden for the County of Baldwin, on \_\_\_\_\_, 19 62  
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 gar-  
nishment 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 pro-  
perty, and whether you have not in your possession or under your control money or effects be-  
longing to the defendant.

Witness my hand this 24 day of Aug, 19 62

*Ex-8-28-62*

*Alvin J. Duck*  
Clerk.

No. 5253

**Circuit Court of Baldwin County**

BANK OF FAIRHOPE

VS.

**Garnishment On Summons**

GEORGE A. HENDERSON, Jr

Issued \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Plaintiff's Attorney

720  
720  
720  
452  
-----  
2614

Sheriff claims 30 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

Received 24 day of Aug 1962  
Served on 28 day of Aug 1962  
Served a copy of the within to  
Woodham Dairies, Inc.  
service on Opriet Lander  
[Signature]  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
R. Dale