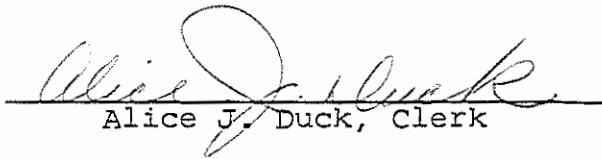


5409

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon F. L. MCKENZIE,
to appear within thirty days from the service of this writ, in the
Circuit Court, to be held for said County at the place of holding
the same, then and there to answer the complaint of PAUL A.
FREDERICK, SR.

Witness my hand, this the 12 day of December,
1962.

Alice J. Duck, Clerk

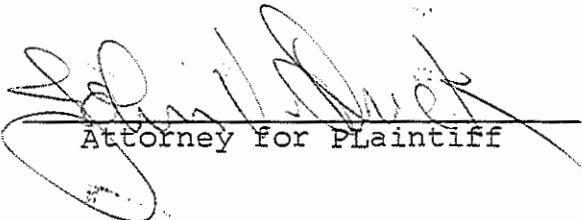
PAUL A. FREDERICK SR.)	IN THE CIRCUIT COURT OF
Plaintiff)	
-VS-)	BALDWIN COUNTY, ALABAMA
)	
F. L. MCKENZIE)	AT LAW.
Defendant)	

Count One:

Plaintiff claims of the Defendant Two Hundred Sixty
and 32/100 (\$260.32) Dollars, due by Promissory Note made by him
on the 8th day of September, 1962, and payable on demand, with
interest thereon.

Count Two:

Plaintiff claims from the Defendant Two Hundred Sixty
and 32/100 (\$260.32) Dollars, damages for the breach of a covenant,
entered into by him on the 8th day of September, 1962, by which
he promised to pay the amount of a repair bill in full on the
Plaintiff's car, caused by the Defendant's negligence, and that
the Defendant has failed and refused to pay the said sum, hence
this suit.


Attorney for Plaintiff

Defendant may be served at
Town & Country Motel Highway 31
Spanish Fort. or
T. H. Pinkie Davis Construction Co.
2506 Osage Ave. Mobile, Ala.

64-12-15-62

FILED
DEC 12 1962
ALICE J. DUCK, CLERK

PAUL A. FREDERICK SR.
Plaintiff

-VS-

F. L. McKENZIE

Defendant

Received 12 day of Dec - 62
and on 15th day of Dec
I served a copy of the within S. & C.
on F. L. McKenzie
By service on _____

TAYLOR WILKINS, Sheriff
By Fred Seibert
Sheriff claims 7 1/2 miles at
Ten Cents per mile Total \$ 7.00.
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF
FILED
DEC 12 1962
ALICE L. DUCK, CLERK
REGISTER

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. JOHN V. DUCK

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

of the Circuit Court of Baldwin County, to-wit: on the 16th day of January

19 63, PAUL A. FREDERICK SR.

recovered a judgment against F. L. MCKENZIE JR.

TWO HUNDRED FIFTY-TWO AND 32/100 for the sum of

Two Hundred Fifty-Two and 32/100 Dollars
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

T. H. PINKIE DAVIS CONSTRUCTION CO. INC.

A Corporation

supposed to be indebted to or have effects of the said F. L. McKenzie

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

Garnishment against said T. H. IPINKIE DAVIS CONSTRUCTION CO. INC.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 16

day of May

A. D. 19 63

Alice J. Duck
Clerk.

John V. Duck

Garnishment on Judgment.

The State of Alabama,
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

Spring TERM, 1963

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Spring Term, 1963, of the Circuit Court of Baldwin County,
to-wit: On the 16th day of January, 1963, being a regular day of
said term, PAUL A. FREDERICK SR.

recovered judgment against F. L. McKenzie

for the sum of Two Hundred Fifty & 32/100 - - - - Dollars, and cost of suit,
and affidavit having been made by JOHN V. DUCK
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

T. H. Pinkie Davis Construction Co. Inc., a Corporation, 2506
Osage, Mobile, 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

T. H. Pinkie Davis Construction Co. Inc. a Corporation

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 Monday in A. D. 1963,
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 its 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 F. L. McKenzie

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

Witness, ALICE J. DUCK, Clerk of said Court, this 16 day of May, A. D., 1963

Issued 16 day of May A. D., 1963

ATTEST:

Alice J. Duck, Clerk.

Ed-5-23-63

Received

20

Day of

May

1963

and on

23

Day of

May

1963

I served

at the residence of

Harold

on

J.H. Junkie Harris Construction

company - a Corp.

by service on

Miss Ballon Bookkeeper

RAY D. BROWN

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

CLERK

372 5409 1/2
Circuit Court, Baldwin County

No. _____

VS. { Garnishment On Judgment

231
7R
Miss Ballon - B.K.

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

RECEIVED

MAY 20 1963

SHERIFF'S OFFICE

Attorney

RELEASE OF GARNISHMENT

Circuit Court of Baldwin County, Alabama

RE: PAUL A. FREDERICK, SR. vs. Plaintiff.

F.L. McKENZIE Defendant.

To: T.H. PINKIE DAVIS CONSTRUCTION, CO., INC., A Corp. GARNISHEE

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that in the above styled case, Garnishment has been released and Garnishee has been discharged.

Witness my hand, this the 22 day of August, 1963

Alice J. Duck, CLERK.

State of Alabama

BALDWIN COUNTY

TO F. L. MCKENZIE, Defendant:

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

PAUL A. FREDERICK SR., Plaintiff,

versus F. L. MCKENZIE, Defendant,

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

T. H. Pinkie Davis Construction Co., Inc., a Corporation

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 16

day of May, 1943.

Clerk of the Circuit Court.

Exp - 5-23-63

5409 1/2

Received 20
and on 23
I served a copy of this writ on the
at 7 L McKenzie

63

63

By service on _____

IN WITNESS WHEREOF

RAY D. HENDERSON, Clerk

By J. James

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

TO

F. L. MCKENZIE

Deft Plaintiff

VS.

PAUL A. FREDERICK SR.

Defendant

2000 ALA CO. CLERK

NOTICE OF GARNISHMENT

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 JOHN V. DUCK

who being duly sworn, on oath says, that a regular Spring Term
of the Circuit Court of Baldwin County, to-wit: on the 16th day of January
19 63, PAUL A. FREDERICK SR.

recovered a judgment against F. L. MCKENZIE
T. C. DAVIS for the sum of

Two Hundred Fifty-Two and 32/100 Dollars
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
T. H. PINKIE DAVIS CONSTRUCTION CO. INC.

A Corporation

supposed to be indebted to or have effects of the said F. L. McKenzie
in its possession, or under its control, and that he believes process of
Garnishment against said T. H. PINKIE DAVIS CONSTRUCTION CO. INC.
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 16

day of May A. D. 1963

Alice J. Duck
Clerk.

John V. Duck

NO.

5409 1/2

CIRCUIT COURT

PAUL A. FREDERICK SR.

VS.

F. L. MCKENZIE

AFFIDAVIT
Garnishment on Judgment

Filed this

FILED

day of

MAY 16 1953

19

ALICE J. DUCK

CLERK

REGISTER

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.



Providence Washington Insurance Co.

of Providence, R.I.

MAURY INSURANCE AGENCY

ALL FORMS OF INSURANCE

15 SOUTH SECTION ST., — PHONE WA 8-9451

FAIRHOPE, ALABAMA

September 8, 1962

A G R E E M E N T

It is hereby stated and agreed between F. L. Mc Kenzie
(who caused the accident to the car, a 1959 Four Door
Plymouth Sedan) and Paul A. Frederick, Sr. the owner
of the car as follows:

Mr. F.L.Mc Kenzie agrees to pay in full to Mr. Paul A.
Frederick, Sr. the total amount of the repair bill in
full, this amount being \$ 250.32 and this includes a
\$ 10.00 charge to Dick's Towing Service. This amount
to be paid when the car described is delivered in a
satisfactory manner within a reasonable length of time.

J. Maury
Witness

F. L. Mc Kenzie
F.L. Mc Kenzie

J. Maury
Witness

Paul A. Frederick
Paul A. Frederick, Sr.

I, Jim Waganer, hereby acknowledge, that F.L.McKenzie
atated to me to repair Mr. Frederick's 1959 Plymouth
Savoy and he, F.L.McKenzie would be responsible for the
repairs done this the 20th September 1962

Jim Waganer Sr

Jim Waganer

Witness