

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

June 18, 1962

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Max M. Foreman
Vs: Glenn Stewart
At Law, No. 4804

Dear Mrs. Duck:

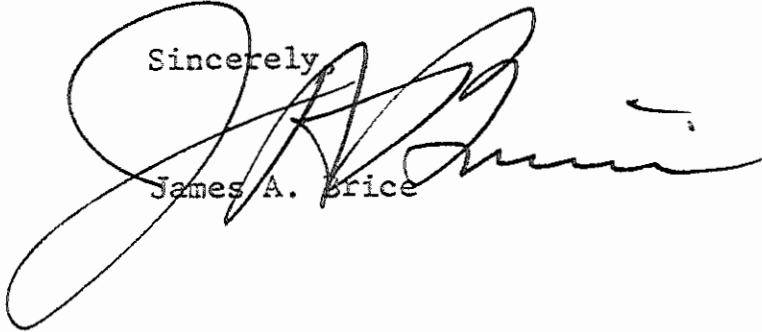
According to my records, Plaintiff in the above case is entitled to judgment by default.

Accordingly I am enclosing promissory note which is the foundation of this suit, and request that you place the file before Judge Hall for judgment for the Plaintiff as follows:

Principal	\$628.10
Interest	34.54
Attorney's fee	<u>125.00</u>
Total	\$787.64

After the judgment has been granted, kindly mail me a certificate of judgment. Thank you.

Sincerely,


James A. Brice

JAB:j
Enclosure

MAX M. FOREMAN;
PLAINTIFF
VS
GLENN STEWART,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

4804

COMPLAINT

The Plaintiff claims of the Defendant the sum of Six Hundred Twenty eight and 10/100 (\$628.10) Dollars, due by promissory note made by the Defendant on the 1st day of June 1960, and payable on the 1st day of July 1961, with interest from the 1st day of June 1960, at the rate of six (6%) per cent per annum.

The Plaintiff claims of the Defendant the sum of Six Hundred Twenty-eight and 10/100 (\$628.10) Dollars, due by promissory note made by the Defendant on the 1st day of June 1960, and payable on the 1st day of July 1961, with interest from the 1st day of June 1960, at the rate of six (6%) per cent per annum.

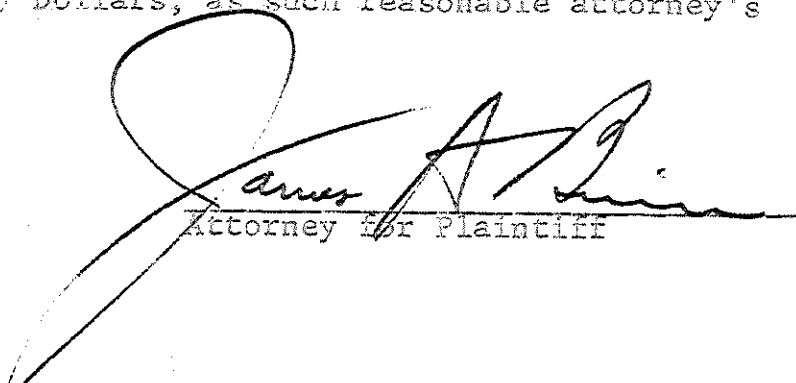
Plaintiff avers that in and by the terms of said note the Defendant waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of One Hundred Twenty-five and 00/100 (\$125.00) Dollars, as such reasonable attorney's fee.

FILED

AUG 7 1961

ALICE I. DUCK, CLERK
REGISTER


Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Glenn Stewart

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 _____

Glenn Stewart

_____, Defendant.

by _____

Max M. Foreman

_____, Plaintiff.

Witness my hand this _____

7

day of _____

August 1961

Alice J. Duck Clerk

Ex. Aug. 12-61

277

No. 4804 Page _____

STATE of ALABAMA
Baldwin County
CIRCUIT COURT

Max M. Foreman

Plaintiffs

vs.

Glenn Stewart

Defendants

Summons and Complaint

Filed **FILED** 19__

AUG 7 1961

ALICE J. DUCK, CLERK
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

8/7, 1961

Sheriff.

I have executed this summons

this Aug 12 1961

by leaving a copy with

Glenn Stewart

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

Carlisle Childress
DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.

MAX M. FOREMAN

PLAINTIFF

VS

GLENN STEWART

DEFENDANT

AND

SOUTHLAND FARMS, INC.,
A CORPORATION

GARNISHEE

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 480412

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, James A. Brice has made affidavit as required by law that Max M. Foreman, on the 19th day of June, 1962, being a regular day of Circuit Court of Baldwin County, Alabama, recovered a judgment against Glenn Stewart for the sum of Seven Hundred Eighty-Seven and 64/100 Dollars (\$787.64), and the further sum of Twenty-Three and 70/100 Dollars (\$23.70) costs of suit, and that he believes that the process of garnishment is necessary to obtain satisfaction of said judgment and that Southland Farms, Inc. a corporation, has or is believed to have in its possession, or under its control, money or effects belonging to the Defendant, or to be liable to him 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 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 Southland Farms, Inc., a corporation, to be and appear at the next term of the Circuit Court of Baldwin County, Alabama, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer it has in its possession, or under its control, any money or effects belonging to

the said Defendant and whether it is indebted to said Defendant or is liable to him on any contract for the payment of money or 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.

WITNESS MY HAND on this the 1 day of June 1964.

Beulah L. Newell
Circuit Clerk

64-6-2-64

no. 4804 1/2

1894
Mat. M. Foreman

vs.

Glenn Stewart

WITNESSE MY HAND ON THIS 2nd day of January 1894

Proberly, or which is hereby in person Proberly.

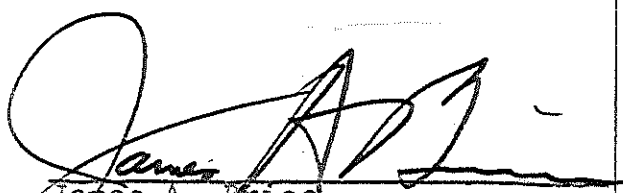
Received 2 day of Jan 1894
and on 2 day of Jan 1894
I served a copy of the writ of Proberly Proberly
on Glenn Stewart
By service on Glenn Stewart and Proberly
TAYLOR WILKINS, Sheriff
By Glenn Stewart D. S.
Proberly

Sherriff claims
Ten Cents per mile Total \$
TAYLOR WILKINS
BY DEPUTY SHERIFF

AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Personally appeared before me, a Notary Public in and for said State and County, James A. Brice, who being duly sworn, deposes and saith that Max M. Foreman, on the 19th day of June 1962, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Glenn Stewart for the sum of Seven Hundred Eighty-Seven and 64/100 Dollars (\$787.64) and the further sum of of Twenty-Three and 70/100 Dollars (\$23.70), costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Southland Farms, Inc., a corporation, has or is believed to have in its possession or under its control, money or effects belonging to the Defendant, or it is liable 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.


James A. Brice

Sworn to and subscribed before me
this 30th day of may
1964.


Notary Public
State of Alabama at Large
Baldwin County

FILED

JUN 1 1964

ALICE I. BUNK, CLERK
REGISTER

MAX M. FOREMAN

PLAINTIFF

VS

GLENN STEWART

DEFENDANT

SOUTHLAND FARMS, INC.,
A CORPORATION

GARNISHEE

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 48041

TO ANY LAWFUL OFFICER OF SAID COUNTY:

You are hereby commanded to notify Glenn Stewart that on the
1 day of June 1964, a Writ of Garnishment in the
above stated case was issued to Southland Farms, Inc., a
corporation, as Garnishee.

And you will return this Writ according to law.

WITNESS my hand this 1 day of June 1964.

W. J. D. D. D.
Circuit Clerk

Received in this office the _____ day of _____ 1964.

Officer

Executed by serving a copy of the within writ on the 12 day
of June 1964.

Officer

OFFICE

OF June 1934

Executed by serving a copy of the within writ on the day

OFFICE

Received in this office the day of June 1934.

WITNES my hand this day of June 1934.

And I will return this writ according to law.

Corroborated as Genuine.

appeared case was referred to Consulting Reine, Inc.'s

quest June 1934 a writ of garnishment in the

not thereby compelled to notify of said Stewart first on the

TO THE COURT OF SAID COUNTY:

OFFICIALS

V. CORPORATION
SOUTHWESTERN, INC.'s

DEEDMAN

STEVEN STURGE
Received day of June 1934

And on day of June 1934

I served a copy of the within writ on the day of June 1934

on Stewart

Shed claims

72 miles

By service on

Total miles per mile Total \$ 72

TAYLOR WILKINS, Sheriff

TAYLOR WILKINS Sheriff

DEPUTY SHERIFF

W. H. C. C. C.

W. H. C. C. C.

MAX M. FOREMAN

PLAINTIFF

VS

GLENN STEWART

DEFENDANT

SOUTHLAND FARMS, INC.,
A CORPORATION

GARNISHEE

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

TO ANY LAWFUL OFFICER OF SAID COUNTY:

You are hereby commanded to notify Glenn Stewart that on the
____ day of June 1964, a Writ of Garnishment in the
above stated case was issued to Southland Farms, Inc., a
corporation, as Garnishee.

And you will return this Writ according to law.

WITNESS my hand this ____ day of June 1964.

Reverend J. L. Smith
Circuit Clerk

Received in this office the ____ day of ____ 1964.

Officer

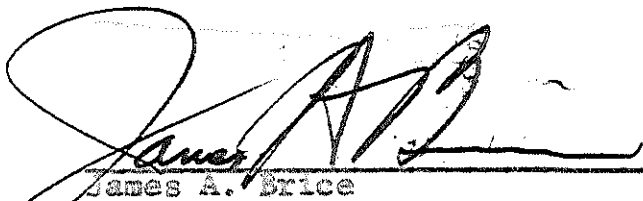
Executed by serving a copy of the within writ on the ____ day
of ____ 1964.

Officer

AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Personally appeared before me, a Notary Public in and for said State and County, James A. Brice, who being duly sworn, deposes and saith that Max M. Foreman, on the 19th day of June 1962, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Glenn Stewart for the sum of Seven Hundred Eighty-Seven and 64/100 Dollars (\$787.64) and the further sum of of Twenty-Three and 70/100 Dollars (\$23.70), costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Southland Farms, Inc., a corporation, has or is believed to have in its possession or under its control, money or effects belonging to the Defendant, or it is liable 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.


James A. Brice

Sworn to and subscribed before me
this 30 day of May
1964.


Notary Public
State of Alabama at Large
Baldwin County

FILED

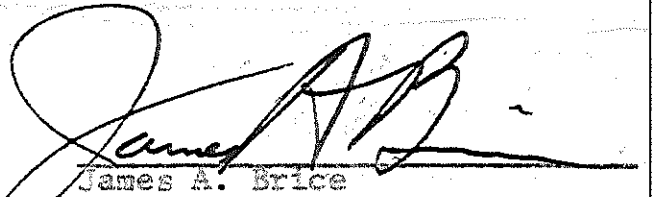
1964

CLERK
REGISTER

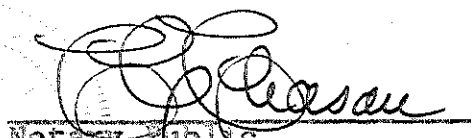
AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Personally appeared before me, a Notary Public in and for said State and County, James A. Brice, who being duly sworn, deposes and saith that Max M. Foreman, on the 19th day of June 1962, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Glenn Stewart for the sum of Seven Hundred Eighty-Seven and 64/100 Dollars (\$787.64) and the further sum of of Twenty-Three and 70/100 Dollars (\$23.70), costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Southland Farms, Inc., a corporation, has or is believed to have in its possession or under its control, money or effects belonging to the Defendant, or it is liable 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.


James A. Brice

Sworn to and subscribed before me
this 30 day of may
1964.


Notary Public
State of Alabama, ~~at Large~~
Baldwin County

FILED

1964

ALICE J. BUCK, CLERK
REGISTERED