

SUMMONS

4830

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon WILLIE SHOOTs 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, Alabama, at the place of holding same by L. IRWIN AND SON, a partnership composed of L. Irwin and F. L. Irwin.

Witness my hand this the 23rd day of August, 1961.

E-4 9-9-61 * * * * * *Alice I. Duck*
Clerk

COMPLAINT

L. IRWIN AND SON, a partnership)	
composed of L. Irwin and F. L.)	
Irwin,)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF)	BALDWIN COUNTY, ALABAMA
VS:)	
)	
WILLIE SHOOTs,)	AT LAW
)	
DEFENDANT)	

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED SIX & 69/100 DOLLARS (\$206.69), due from him by account on, to wit: the 9th day of July, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED SIX & 69/100 DOLLARS (\$206.69), due from him on account stated between the plaintiff and the defendant on, to wit: the 9th day of July, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED SIX & 69/100 DOLLARS (\$206.69), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 9th day of July, 1961, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 18th day of August, 1961.

Julius C. H. / Hs
Attorney for Plaintiff

The defendant's address is:
Foley, Alabama

FILED
AUG 23 1961
ALICE I. DUCK, CLERK
REGISTER

PHONES: LOCAL WH 3-2314 LONG DISTANCE WH 3-2324
FOLEY, ALA.

Date _____

Address

All claims and returned goods MUST be accompanied by this bill.

410

Rec'd By

L. IRWIN AND SON

GROWERS AND SHIPPERS

FEEDS, SEEDS AND FERTILIZERS

INSECTICIDES

PHONES: LOCAL WH 3-2314 LONG DISTANCE WH 3-2324
FOLEY, ALA.

Customer's
Order No.

Date

3-23-60

Name

Walker Shurtz

Address

SOLD BY

CASH

C. O. D.

CHARGE

ON ACCT.

MDSE. RETD.

PAID OUT

QUAN.

DESCRIPTION

PRICE

AMOUNT

203

H Corn

34

689

W. M. Shurtz

3

All claims and returned goods MUST be accompanied by this bill.

411

Rec'd By

GROWERS AND SHIPPERS
FEEDS, SEEDS AND FERTILIZERS
INSECTICIDES

PHONES: LOCAL WH 3-2314 LONG DISTANCE WH 3-2324
FOLEY, ALA.

Date _____

19

Name

Address

[illegible]

All claims and returned goods MUST be accompanied by this bill.

1687

Rec'd By

CARSON PRINTING CO., FOLEY, ALA. 80978

INSECTICIDES

FOLEY, ALA.

1960

Address

All claims and returned goods MUST be accompanied by this bill.

1834

Rec'd By

L. IRWIN AND SON

GROWERS AND SHIPPERS

FEEDS, SEEDS AND FERTILIZERS
INSECTICIDES

PHONES: LOCAL WH 3-2314

LONG DISTANCE WH 3-2324

FOLEY, ALA.

Customer's
Order No.

Date

7-9-20

19

Name

Address

SOLD BY

CASH

C. O. D.

CHARGE

ON ACCT.

MOSE. RETD.

PAID OUT

QUAN.

DESCRIPTION

PRICE

AMOUNT

3

Beans

28 80

2047

All claims and returned goods MUST be accompanied by this bill.

Rec'd By

W. Lee

CARSON PRINTING CO., FOLEY, ALA.

80978

NO. 14830
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

L. IRWIN AND SON, a partnership
composed of L. Irwin and F. L.
Irwin,

PLAINTIFF

-VS-

WILLIE SHOOT, S,

DEFENDANT

Sheriff claims 12 miles at
Ten Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

Received 23 day of August 1941
and on 9 day of August 1941
I served a copy of the within 12
on Willie Shoot
By service on _____

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

FILED
AUG 23 1941
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

October 10, 1961

Honorable H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

4830

Re: L. Irwin and Son
vs: Willie Shoots

Dear Judge Hall:

Kindly render a judgment in the case mentioned above in
the amount of \$222.00, based on a sworn to, itemized statement
of account.

With best wishes, I am

Cordially yours,


FOREST A. CHRISTIAN

14
75
92
10370

State of Alabama
BALDWIN COUNTY

TOWillie Shoots....., Defendant.....:

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

.....L. Irwin & Son....., Plaintiff.....,

versusWillie Shoots....., Defendant.....,

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

.....Foley Foundry, Foley, Ala.....

has been named as Garnishee.....

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

day ofJuly....., 19463.....

Alice J. Luck

Clerk of the Circuit Court.

Ex-7-18-63

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

WILLIE SHOOTTS

L. IRWIN & SONS

Plaintiff.....

VS.

WILLIE SHOOTTS

Defendant.....

ceived 16 day of July 1963

d on 18 day of July 1963

served a copy of the within Notice

Willie Shootts

/ service on

TAYLOR WILKINS, Sheriff

By Carlisle Childress D. S.

Foley

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Carlisle Childress

DEPUTY SHERIFF

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 FOREST A. CHRISTIAN,

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

of the Circuit Court of Baldwin County, to-wit: on the 25th day of October

19 61, L. Irwin & Son

recovered a judgment against Willie Shoots

for the sum of

TWO HUNDRED TWENTY AND 00/100 (\$220.00) Dollars

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

FOLEY FOUNDRY, Foley, Alabama

supposed to be indebted to or have effects of the said Willie Shoots

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

Garnishment against said FOLEY FOUNDRY, Foley, Alabama

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 11th

day of 16 July A. D. 1963.

Alice J. Duck
Clerk.

Forest A. Christian

NO. 48301

CIRCUIT COURT

vs.

AFFIDAVIT
Garnishment on Judgment

Filed this _____ day of _____, 19____

Clerk.

Garnishment on Judgment. 2010

The State of Alabama,
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19 63.

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular October Term, 1961, of the Circuit Court of Baldwin County,
to-wit: On the 25th day of October, 1961, being a regular day of
said term, L. Irwin & Son

recovered judgment against Willie Shoots

for the sum of TWO HUNDRED TWENTY AND 00/100 (\$220.00) Dollars, and cost of suit,
and affidavit having been made by FOREST A. CHRISTIAN
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

FOLEY FOUNDRY, Foley, Alabama

has or is believed to have in its possession, or under its control money
or effects belonging to said defendant Willie Shoots or that it is, or
is believed to be indebted to said defendant Willie Shoots 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 FOLEY FOUNDRY, Foley,

Alabama

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 within 30 days Monday in A. D. 19 63,
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
Willie Shoots and whether it will not be indebted in future to said defendant
Willie Shoots 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 Willie Shoots

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

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

Issued 16 day of July, A. D., 1963.

ATTEST:

Alice J. Duck, Clerk.

Received 16 day of July 1963
and on 18 day of July 1963

I served a copy of the within Barn.
on Foley Vending

By service on McKinley Ingr

TAYLOR WILKINS, Sheriff
By Carlisle Children D. S.

Foley
Foley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff
BY Carlisle Children
DEPUTY SHERIFF

Circuit Court, Baldwin County

No. 45304

L. Irwin & Sons

VS. } Garnishment On Judgment

Willie Shoots

Issued 16 day of July 1963

Returnable day of 19

Attorney

STATEMENT

L. IRWIN AND SON
GROWERS AND SHIPPERS
FOLEY, ALABAMA

3/2 1960

Willie shoots

	CHARGES	CREDITS	BALANCE
Jan 6-8-8 Inst ₃			41.00
Copy of Inv # 2933			

STATEMENT

L. IRWIN AND SON

GROWERS AND SHIPPERS

FOLEY, ALABAMA

August 18th

1961

I do certify that this is a true
and correct statement of account,
after allowing all just credits.

Willie Shoots,

Foley, Ala.

F. L. Irwin
F. L. Irwin

	Invoice Number	CHARGES	CREDITS	BALANCE
60	2933 1 Ton 6-8-8 Fertz		\$	41.00
	410 30 Bags 4-10-7 Fertz			54.00
	411 203 Lbs Corn			6.09
	4016 3 Bags Ammo Nitrate			12.00
	1687 6 Bu. Jackson Cert Beans			21.60
	1834 2 Bd. " " "			7.20
	2047 8 Bu. Lee Beans			28.80
	#45 1 Ton 4-10-7 Fertz			36.00
worn to and subscribed to before me his the 18th day of August, 1961.				206.69
<i>Janice L. Childress</i> Notary Public, Baldwin County, Alabama				