

THE MERCHANTS NATIONAL BANK	X	
OF MOBILE, a national banking		
association,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
Vs.	X	AT LAW
J. C. VERNON,	X	CASE NO. 4951
Defendant.	X	

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's Complaint says:

1.

He is not guilty of the matters alleged therein.

2.

The Defendant pleas a general issue.

WILTERS & BRANTLEY

BY: *William M Brantley*

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: *William M Brantley*

FILED

JAN 8 1962

ALICE J. DUCK, CLERK
REGISTER

THE MERCHANTS NATIONAL BANK
OF MOBILE, a national banking
association,

Plaintiff

vs.

J.C. VERNON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW NO. _____.

The Plaintiff claims of the Defendant FOUR HUNDRED EIGHTY (\$480.00) DOLLARS, due by promissory note made by him on January 10, 1961, payable in 12 monthly installments of \$40.00, the first installment being due on February 10, 1961. Plaintiff further alleges that in and by the terms of said note, default in making any payment renders the unpaid balance of the principal and accrued interest at once due and payable. Plaintiff further claims interest thereon from the date of the loan.

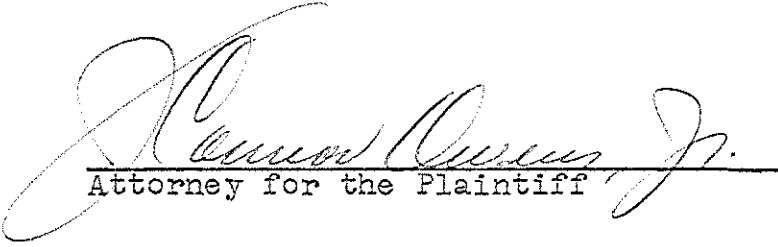
Plaintiff further alleges that the Defendant, in and by said note waived all rights of exemption of every kind under the Laws of this State, and Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note that the Defendant agreed to pay a reasonable attorney's fee in the event of default and suit thereon, and Plaintiff claims the further and additional sum of \$72.00 as a reasonable attorney's fee in the premises.

FILED

NOV 20 1961

ALICE J. DUCK, CLERK
REGISTER


Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4951

NOVEMBER TERM, 1961

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J.C. VERNON

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 _____

J.C. VERNON, Defendant

by THE MERCHANTS NATIONAL BANK OF MOBILE, a national banking
association, Plaintiff

Witness my hand this 20 day of November 1961

Ex-12-1-61

W. J. Duck, Clerk

Defendant resides at: Route 1, Box 81, Bay Minette, Alabama

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

vs. _____
Plaintiffs

Defendants

SUMMONS and COMPLAINT

Filed _____, 19_____

_____, 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

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW NO. 04951

THE MERCHANTS NATIONAL BANK OF
MOBILE, a national banking as-
sociation,

Plaintiff,

vs.

J.C. VERNON,

Defendant.

SUMMONS & COMPLAINT

FILED

NOV 30 1961

ALICE J. DUCK, CLERK
REGISTER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahlberg Building

BAY MINETTE, ALABAMA

By service on _____

Received 20 day of Dec 1961
and on 1 day of Dec 1961
I served a copy of the within etc
on J.C. Vernon

TAYLOR WILKINS, Sheriff
By W.A. Robert
3 miles south of B.M.

Sheriff claims 6 miles at

Ten Cents per mile Total \$ 60.00

TAYLOR WILKINS, Sheriff

BY Robert
DEPUTY SHERIFF

THE MERCHANTS NATIONAL BANK
OF MOBILE,

Plaintiff

vs

J. C. VERNON

Defendant

BENDER WELDING & MACHINE CO.

Garnishee

& IN THE CIRCUIT COURT OF
& BALDWIN COUNTY, ALABAMA

&

&

&

&

&

&

CASE NO. 4951

GARNISHEE'S ANSWER

Comes now Bender Welding & Machine Company, Incorporated,
Garnishee in the above styled cause and for answer says that
it is indebted to the defendant J. C. Vernon and that since
service of garnishment in this cause is deducting twenty-five
(25%) percent of said J. C. Vernon's wages each week and will
continue to do so until the judgment and cost in the above styled
cause are paid, at which time remittance will be made to the
Circuit Court of Baldwin County in full.

T. Dwight Reid
BENDER WELDING & MACHINE COMPANY

BY: T. DWIGHT REID, ATTORNEY for Garnishee

Garnishment on Judgment.

The State of Alabama,
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

JULY

TERM, 1962

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Spring Term, 1962, of the Circuit Court of Baldwin County,
to-wit: On the 15th day of March, 1962, being a regular day of
said term, The Merchants National Bank of Mobile

recovered judgment against J.C. Vernon

for the sum of Five Hundred Thirty-Two & 80/100 Dollars, and cost of suit,
and affidavit having been made by J. Connor Owens, Jr.
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

Bender Welding & Machine Company, Inc.

has or is believed to have in its possession, or under its control money
or effects belonging to said defendant it is, or
is believed to be indebted to said defendant it 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

Bender Welding & Machine 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, within 30 days hereof
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
it and whether it will not be indebted in future to said defendant
it 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 J.C. Vernon

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

Witness, ALICE J. DUCK, Clerk of said Court, this 25 day of July, A.D., 1962.

Issued day of A. D., 19

Bender Welding & Machine
Company, Inc.
265 S. Water Street
Mobile, Alabama

ATTEST:

Alice J. Duck, Clerk.

EX-7-27-62

Received 26 Day of July 1962
and on 27 Day of July 1962
I served a copy of the within
on Benoit Welding and
Machine Repair
by service on Mrs. - Griffin
Office Manager
RAY D. BRIDGES, Sheriff
J. L. Chambers

RECEIVED
JUL 26 1962
SHERIFF'S OFFICE

ok
3289
Circuit Court, Baldwin County

No. 4951

THE MERCHANTS NATIONAL BANK
OF MOBILE,

Plaintiff,

VS. } Garnishment On Judgment

J.C. VERNON,

Defendant.

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

27th ch
Mrs. Griffin, off mgr

J. Connor Owens, Jr.
Attorney

State of Alabama

BALDWIN COUNTY

TO J.C. VERNON

Defendant:

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

THE MERCHANTS NATIONAL BANK OF MOBILE

Plaintiff

versus J.C. VERNON

Defendant

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

Bender Welding & Machine Company, Inc.

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 25th day of July, 1962.

Allice J. Duck
Clerk of the Circuit Court.

Ent-7-27-62

4951 1/2

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

TO

The Merchants National
Bank of Mobile

Plaintiff.....

VS.

J.C. Vernon

Defendant.....

J. Connor Owens Jr.

EXECUTED

This 27 day of July, 1962
by serving a copy of the within on

J. C. Vernon
RAY D. BRIDGES, Sheriff
By L. Chambers

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 J. Connor Owens, Jr.

who being duly sworn, on oath says, that a regular Spring Term
of the Circuit Court of Baldwin County, to-wit: on the 15th day of March
19 62, The Merchants National Bank of Mobile
recovered a judgment against J.C. Vernon

for the sum of
Five Hundred Thirty-Two and 80/100 (\$532.80) Dollars
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
Bender Welding & Machine Company, Inc.

supposed to be indebted to or have effects of the said J.C. Vernon
in its possession, or under its control, and that he believes process of
Garnishment against said Bender Welding & Machine Company, Inc.
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 25
day of July A. D. 19 62

Alice J. Duck
Clerk.

J. Connor Owens, Jr.

NO. 4951 1/2

CIRCUIT COURT

The Merchants National Bank
of Mobile

vs.

J.C. Vernon

AFFIDAVIT Garnishment on Judgment

Filed this _____ day of

July

19 62

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.