# JAMES A. BRICE

BOX 298 • FOLEY, ALABAMA • WH 3-3601

MESSACE	REFLY
Mrs. Alice J. Duck Circuit Clerk Bay Minette, Alabama	DATE
DATE October 7, 1963	
re: Rhodes Distributing Company, Inc., a corporation vs: Norman Currier	
Enclosure: Summons and Complaint	
	300 300 300 300 300 300 300 300 300 300
	SIGNED

I. WRITE REPLY. II. DETACH STUD, KEEP PINK EOPY, RETURN WHITE COPY TO SENDER.

INSTRUCTIONS TO SCHOERS

1. KEEP YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARGON INTACT.

RHODES DISTRIBUTING COMPANY, INC., ) a corporation

PLAINTIFF

DEFENDANT

IN THE CIRCUIT COURT OF

VS

NORMAN CURRIER,

BALDWIN COUNTY, ALABAMA

AT LAW, NO.

728.5738

### COMPLAINT

The Plaintiff claims of the Defendant Three Hundred Eleven and 94/100 Dollars (\$311.94), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 28th day of January 1963, which sum of money, with interest thereon, is still unpaid.

Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof, an itemized statement of account verified by affidavit of Charles Rhodes, a competent witness, sworn to before a Notary Public, which statement shows the amount due on account as of the 28th day of January 1963, and due at present.

#### AFFIDAVIT

S	TE OF ALABAMA )
	DWIN COUNTY )
	Before me, the undersigned , a Notary Public in and
f	said County and State, personally appeared Charles Rhodes
_	, who being by me first duly sworn, deposes and says: that
	e is the secretary of Rhodes Dist. Co., Inc.,a corporation
t	t the annexed statement of account of the said Rhodes Distributing
	ompany, Inc. , against Norman Currier
****	, is just, true and correct; that there is now due on said
8	ount Three Hundred Eleven and 94/100 Dollars (\$311.94) after
đ	ucting all credits, set/offs or counterclaims
and the second	(Marlin Dlions
ું	rn and subscribed before me on this the Charles Rhodes
	7th day of October, 1963.
TO TO	cuico C // // / / / / / / / / / / / / / / /
, Pan	ary Public, Baldwin County, Alabama 276
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			SEED - FERTILIA TELEPH P. O. Box 233			r		
Date	• ,	invoice no.	ARTICLE	5		PF	RICE	
-22	62	130	67 bags Citrus	Pulp			158	79
-27	62,	157962	4tons 13-13-1				274	00
			5 tons 0-10-2	0			1.95	50
-1	62	37/					157	>>
		613					299	20
1-20	62	Credit	29355 lbs Hay	33 of perton	485	32	1085.	26
2-1	62	Credit	4, to. P. Payment		136	00		
-18	63	Eredit	H tons Hay ?	38 perton	152	00		
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The State of Alabama, No.	
TO ANY SHERIFF OF THE STATE OF ALABAMA	
You Are Commanded to Summon Norman Currier	
	***
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	
Norman Currier	, Defendant
Rhodes Distributing Company, Inc., aucorpor	ation
	, Plaintiff
Witness my hand this day of day of 19.6.25	

Ext-11-15-63

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## STATE of ALABAMA

**Baldwin County** 

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Rhodes Distributing Company,

Inc., a corporation

Plaintiffs

vs.

Norman Currier

Defendants

Complaint Summons

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

Sheriff.

I have executed this summons

by leaving a copy with

- Curry

iniles as

Sheriff.

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 the Rhodes Distributing Company, Inc., a corporation, on the 21st day of November 1963, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Norman Currier for the sum of Three Hundred Twenty-seven and 53/100 Dollars (\$327.53) and the further sum of Twenty-three and 50/100 (\$23.50) Dollars, costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Barber Pure Milk Company, 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 6th day of January 1964.

otary Public Jahre

State of Alabana at Large

ALICE A DUNK, SEGISTERS

## JAMES A. BRICE

BOX 298 • FOLEY, ALABAMA • WH 3-3601

M	E S S A G E	REP	LY
Mrs. Ali	.ce J. Duck	DATE	
Circuit Bay Mine	Clerk ette, Alabama		
N/1000AN (Sec. 14.			
December	: 6, 1963		
Vs: Noi	odes Distributing Company, Inc man Currier Law, No. 5738	**************************************	
Enclosur	es: Writ of Garnishment Affidavit on Judgment		
	Summons		
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e today to an anni anni anni anni anni anni anni			
and the second s			
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INSTRUCTIONS TO RECEIVER:

1. WRITE REPLY: 2. DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

INSTRUCTIONS TO SENDER;

1. KEEP YELLOW COPY. 2. SEND WHITE AND PINK COPICS WITH CARDON INTACT.

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### 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 the Rhodes Distributing Company, Inc., a corporation, on the 21st day of November 1963, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Norman Currier for the sum of Three Hundred Twenty-seven and 53/100 Dollars (\$327.53) and the further sum of Twenty-three and 50/100 (\$23.50) Dollars, costs of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Barber Pure Milk Company, 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 6th day of January 1964.

Notary Public

State of Alabama at Large

FILED

WW 7 1964

MINT & DUNK, CLERK REGISTER

RHODES DISTRIBUTING COMPANY, INC., )
A CORPORATION

PLAINTIFF

VS

NORMAN CURRIER

DEFENDANT

AND

BARBER PURE MILK COMPANY, INC., A CORPORATION

**GARNISHEE** 

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW, NO. 5738½

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, James A. Brice has made affidavit as required by law that Rhodes Distributing Company, Inc., a corporation, on the 21st day of November 1963, being a regular day of Circuit Court of Baldwin County, Alabama, recovered a judgment against Norman Currier for the sum of Three Hundred Twenty-seven and 53/100 Dollars (\$327.53), and the further sum of Twenty-three and 50/100 Dollars (\$23.50) costs of suit, and that he believes that the process of garnishment is necessary to obtain satisfaction of said judgment and that Barber Pure Milk Company, 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 Barber Pure Milk Company, 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.

Circuit Clerk

Ex-1-22-64

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RHODES DISTRIBUTING COMPANY, INC., A CORPORATION	
PLAINTIFF	IN THE CIRCUIT COURT OF
vs	BALDWIN COUNTY, ALABAMA
NORMAN CURRIER	$\hat{\lambda}$ AT LAW, NO. $5738\frac{1}{2}$
DEFENDANT	
BARBER PURE MILK COMPANY, INC., A CORPORATION	
GARNISHEE	
TO ANY LAWFUL OFFICER OF SAID	COUNTY:
You are hereby commanded to no	tify Norman Currier that on the
	64, a Writeof Garnishment in
the above stated case was issued to	o Barber Pure Milk Company, Inc.
a corporation, as Garnishee.	
And you will return this Write	according to law.
WITNESS my hand thisday	of June 1964.
	Circuit Clerk
Received in this office the	_day of1964.
	Officer
Executed by serving a copy of the	within write on theday
of1964.	
EX-1-20-64	Officer

COURT OF AMARAIA MORMAN CURRIER BARBER PURE MILK COMPANY, INC., CARWISHED TO AMY LAWFUL OFFICER OF SAID COURTY: You are hereby commanded to notify Norman Currier that on development de voi de l'accommendation de l'ac the above stated case was issued; to Barbar Pure Milk a componation, as Carnishee. And you will return this Writesecording to law. WINNESS my hand this \_\_\_\_day of Received in this office the day of which the second Executed by serving a copy of the within write on the day 160510