

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

January 20, 1964

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

Dear Mrs. Duck,

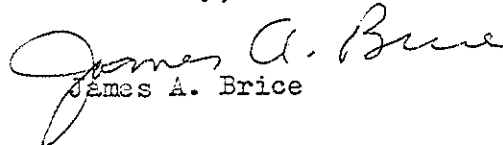
Re: Case at Law No. 5786
Providence Hospital V. Robert Couch

According to my records the plaintiff is entitled to
judgment by default in the amount of \$463.52.

\$ 313.35	principal
87.50	interest
62.67	attorney's fee
<u>\$ 463.52</u>	

Please place this file before Judge Hall and send
me a certificate of judgment. Thank you.

Sincerely,


James A. Brice

jab:mm

COMPLAINT

Providence Hospital,
Plaintiff

Vs

Robert Couch
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

I

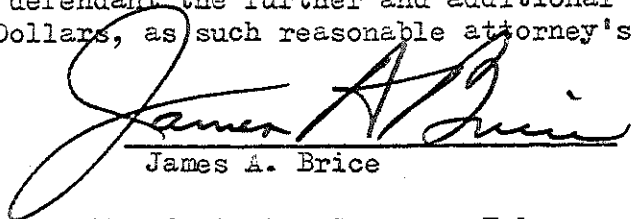
The plaintiff claims of the defendant the sum of Three Hundred Thirteen and 35/100(\$313.35)Dollars, due by promissory note made by the defendant on the 23rd day of September, 1960, and payable in twelve installments of Twenty-Six and no/100(\$26.00)Dollars payable on the 15th day of each consecutive month, beginning October 23, 1960, with interest from the 23rd day of September, 1960, at the rate of eight (8%) per cent per annum, payable monthly in advance on unpaid balance.

II.

The plaintiff claims of the defendant the sum of Three Hundred Thirteen and 35/100(\$313.35)Dollars, due by promissory note made by the defendant on the 23rd day of September, 1960, and payable in twelve installments of Twenty-Six and no/100(\$26.00)Dollars payable on the 15th day of each consecutive month, beginning October 23, 1960, with interest from the 23rd day of September, 1960, at the rate of eight (8%) per cent per annum, payable monthly in advance on unpaid balance.

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 Sixty Two and 67/100(\$62.67)Dollars, as such reasonable attorney's fee.


James A. Brice

Mr. Robert Couch is employed by the Hale Manufacturing Company, Foley, Alabama, and resides at Robertsdale, Alabama.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Robert Couch

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 Robert Couch

-----, Defendant-----

by Providence Hospital

-----, Plaintiff-----

Witness my hand this 25 day of Oct 1963

-----, Clerk

Exp-11-18-63

Arice J. Smith

No. 5786 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

Providence Hospital

Plaintiffs

vs.

Robert Couch

Defendants

Summons and Complaint

FILED

Filed 19

OCT 25 1963

**ALICE I. DICK, CLERK
REGISTER**

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Foley Defendant lives at
Robert Foley, Alabama
employed, ~~Robert Foley~~ Hale Manuf.
Co., Foley, Alabama

Received In Office

Oct 25 1963

Sheriff

I have executed this summons

this Nov 18 1963

by leaving a copy with

Robert Couch

Sheriff claim
Ten Cents per mile Total
By TAYLOR WILLIAMS Sheriff
Deputy Sheriff

Proprietor Sheriff
Robert Foley Deputy Sheriff

Foley

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 James A. Brice

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

of the Circuit Court of Baldwin County, to-wit: on the 21st day of January

19-64 Providence Hospital

recovered a judgment against Robert Couch

for the sum of

Dollars

Four Hundred Sixty-Three and 52/100 (\$463.52)
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

Hale Manufacturing Company

supposed to be indebted to or have effects of the said Robert Couch

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

Garnishment against said Hale Manufacturing Company

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 13

day of February A. D. 1964

Virgie E. Johnson

Clerk

Notary Public

James A. Brice

NO. 5786 1/2

CIRCUIT COURT

PROVIDENCE HOSPITAL,
PLAINTIFF

VS.

ROBERT COUCH,
DEFENDANT
HALE MANUFACTURING COMPANY
GARNISHEE

AFFIDAVIT Garnishment on Judgment

Filed this _____ day of

FILED

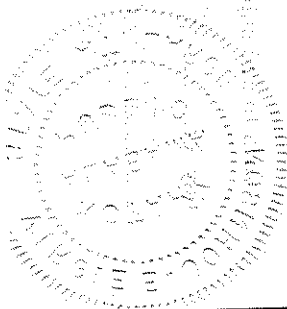
19

FEB 17 1934

ALICE L. THICK
CLERK
REGISTER

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.



RELEASE OF GARNISHMENT

Circuit Court of Baldwin County, Alabama

RE: PROVIDENCE HOSPITAL
vs. Plaintiff.

ROBERT COUCH

Defendant.

To: THE HALE MANUFACTURING COMPANY
GARNISHEE

I, Alice J. Duck, Clerk of the Circuit Court ~~State~~ 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 19 day of October, 19 64

Alice J. Duck, CLERK.

750

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA

October 1, 1964

AREA CODE 205
TELEPHONE WH 3-8611
TELETYPE 560-1256

Mrs. Alice J. Duck, Clerk
CIRCUIT COURT OF BALDWIN COUNTY
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Case No. 5786½
Providence Hospital
VS
Robert Couch

We as the Garnishee in the above case wish to inform you that on September 29, 1964 Robert Couch was discharged from our employ. Attached please find our check to cover the amount deducted. We are no longer indebted to him and desire to be released of the above garnishment.

Sincerely,

THE HALE MANUFACTURING COMPANY

Sue Blackerby
(Mrs.) Sue Blackerby
Office Manager

/b

Attachment - \$232.50 Ck #2267

FILED

OCT 2 1964

Alice J. Duck, CLERK
REGISTER

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA

February 19, 1964

AREA CODE 205
TELEPHONE WH 3-8611
TELETYPE 560-1256

Mrs. Alice J. Duck, Clerk
CIRCUIT COURT OF BALDWIN COUNTY
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Case No. 5786½
Providence Hospital
VS
Robert Couch

We as the Garnishee in the above case wish to inform you that Robert Couch is employed by us and that we are indebted to him. As of Week Ending 2/16/64, we will deduct \$7.50 per week (per instructions received over the telephone today per Mr. James Brice) until the stated amount is deducted.

We will be awaiting your cost bill. We have the following figure due, \$463.52.

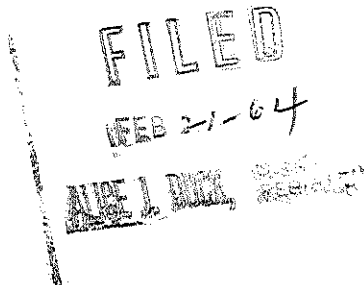
If we can be of further help in the above matter, please let us know.

Sincerely yours,

THE HALE MANUFACTURING COMPANY

Sue Blackerby
(Mrs.) Sue Blackerby
Office Manager

/b



Garnishment on Judgment.

The State of Alabama,
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Spring Term, 1964, of the Circuit Court of Baldwin County,
to-wit: On the 21 day of January, 1964, being a regular day of
said term, Providence Hospital

recovered judgment against Robert Couch

for the sum of Four Hundred Sixty-Three and 52/100 (\$463.52) Dollars, and cost of suit,
and affidavit having been made by James A. Brice
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

Hale Manufacturing Company

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

Hale Manufacturing Company

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 first Monday in March A. D. 1964,
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 it answer, or at any time intervening the time of serv-
ing the garnishment, and making the answer it 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 Robert Couch

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

Witness, ALICE J. DUCK, Clerk of said Court, this 17 day of Feb, A. D., 1964
Issued 17 day of Feb A. D., 1964

ATTEST:

E. F. - 2 - 17 - 64

727

Alice J. Duck, Clerk.

Received 17 day of Feb. 1904
on 17 day of Feb. 1904
served a copy of the within arbit
Hale Mfg. Co.

service on Hale Mfg. Co.
Qui Blackely Bk
TAYLOR WILKINS, Sheriff
By J. M. Easton D. S.
Goley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Easton
DEPUTY SHERIFF

Circuit Court, Baldwin County

No. 5786 1/2

PROVIDENCE HOSPITAL,
PLAINTIFF

VS. } Garnishment On Judgment

ROBERT COUCH,
DEFENDANT
HALE MANUFACTURING COMPANY,
GARNISHEE

Issued 17 day of Feb. 1904

Returnable _____ day of _____ 19____

James A. Brice
Attorney

State of Alabama

BALDWIN COUNTY

TO Robert Couch , Defendant.....:

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

..... Providence Hospital , Plaintiff.....,

versus Robert Couch , Defendant.....,

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

..... Hale Manufacturing Company

has... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the..... 17

day of Feb , 1944.....

E4-2-17-44

Henry J. French

Clerk of the Circuit Court.

70.57861

Received 17 day of Feb 1964
and on 17 day of Feb 1964
I served a copy of the within Notice
on Robert Couch
By service on Robert Couch

Taylor Wilkins, Sheriff
J. M. Eastman
Deputy Sheriff
Shew in claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Eastman
DEPUTY SHERIFF

NOTICE
TO DEFENDANT OF GARNISHMENT

BY,

CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

PROVIDENCE HOSPITAL

Plaintiff.....

VS.

ROBERT COUCH

Defendant.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, ^{Virgie E. Johnson N.P.} ~~Alice J. Duck~~, Clerk of the Circuit Court in and for Baldwin County and

State aforesaid _____ James A. Brice _____

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

of the Circuit Court of Baldwin County, to-wit: on the 21st day of January

19 64, Providence Hospital

recovered a judgment against Robert Couch

_____ for the sum of

Four Hundred Sixty-Three and 52/100 (\$463.52) Dollars

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

Hale Manufacturing Company

supposed to be indebted to or have effects of the said Robert Couch

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

Garnishment against said Hale Manufacturing Company

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 13

day of February A. D. 1964

Virgie E. Johnson
Notary Public
Clerk

James A. Brice

NO. 5786 1/2

CIRCUIT COURT

PROVIDENCE HOSPITAL,
PLAINTIFF

VS.

ROBERT COUCH,
DEFENDANT
HALE MANUFACTURING COMPANY,
GARNISHEE

AFFIDAVIT Garnishment on Judgment

Filed this _____ day of

19____

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.

JAMES A. BRICE
ATTORNEY AT LAW
BOX 298 • FOLEY, ALABAMA • WH 3-3601

M E S S A G E

R E P L Y

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

DATE

October 15, 1964

Re: Providence Hospital V. Robert
Couch - At Law No. 5786-1/2

Dear Mrs. Duck:

As Attorney for Providence Hospital, I ask that you send to me the check recently forwarded to you by Mrs. Sue Blackerby as Office Manager for The Hale Manufacturing Company.

I also ask you to dismiss the garnishment against the Hale Manufacturing Company since they have informed me that Robert Couch is no longer an employee there.

Thank you.

Yours very truly,

James A. Brice
James A. Brice

JAB:bd

SIGNED

INSTRUCTIONS TO SENDER:

INSTRUCTIONS TO RECEIVER:

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

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