

G. T. MCGILL, d/b/a
G. T. MCGILL GROCERY

Plaintiff

vs

WILLIE WYNN
Defendant
J. A. MOTHERSHEAD,
Garnishee

X

X

IN THE CIRCUIT COURT OF

X

Baldwin County, Alabama

X

X

X

5811

Personally appeared before me, C. Lenoir Thompson, a Notary Public, in and for said State and County, J. A. Mothershead, who is personally known to me, who being by me duly sworn, on oath says, that he is the garnishee in the above-stated case, and answering the garnishment therein says that he is not now indebted to the defendant in any sum whatever, and was not indebted to him at the time of the service of this garnishment, nor at any time intervening between the time of the service of the garnishment and the making of this answer, and that he will not be indebted in the future to the said defendant by any contract then or now existing, and that he will not be liable to the defendant for the delivery of personal property by any contract then or now existing, for the delivery of personal property, nor for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and that he has not in his possession or under his control money or effects belonging to the defendant, in that the said defendant is indebted to the said garnishee in amounts exceeding \$600.00 under written notes, mortgages or contracts.

J. A. Mothershead

Sworn to and subscribed before me this 15 day of November,

1963.

C. Lenoir Thompson
Notary Public, Baldwin County, Alabama

FILED

NOV 15 1963

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

SUMMONS

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Willie Wynn, of Phillipsville Route, Bay Minette, Alabama, to appear and plead, answer or demur within the time allowed by law from the service hereof to the Complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against the said Willie Wynn by G. T. McGill, d/b/a G. T. McGill Grocery and Market, Owner.

WITNESS my hand and seal this 12 day of November, 1963.

Alice J. Duck
Clerk

G. T. McGILL, d/b/a)	IN THE CIRCUIT COURT OF
G. T. McGILL GROCERY & MARKET)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
VS)	AT LAW.
WILLIE WYNN,)	No. <u>5811</u>
Defendant.)	

COUNT 1:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY-SEVEN and 42/100 (\$347.42) DOLLARS, due from him on account between the Defendant and the Plaintiff, on, to-wit, February 15, 1962, which sum of money, with interest thereon, is still unpaid.

COUNT 2:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY-SEVEN and 42/100 (\$347.42) DOLLARS, due from him on account stated between the Plaintiff and the Defendant, on, to-wit, February 15, 1962, which sum of money, with interest thereon, is still unpaid.

COUNT 3:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY-SEVEN and 42/100 (\$347.42) DOLLARS, due from the Defendant for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, February 15, 1962, at his request, which sum of money, with interest, is still unpaid.

Kenneth Cooper
Attorney For Plaintiff

Defendant's Address is:
Phillipsville Route
Bay Minette, Alabama

E4-11-12-63

FILED

NOV 17 1963

ALICE J. DUCK, CLERK
REGISTER

5811

G. J. Mc Gill d/b/a
G. J. Mc Gill Grocery
& Market

vs.
Willie Wynn

Received 12 day of Nov 1963
and on 12 day of Nov 1963
I served a copy of the within D & C
on Willie Wynn
by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
10 miles north of B...

Sheriff claims 20 miles as
Ten County term for D. S. 2.00
TAYLOR WILKINS, Sheriff
BY W. A. Talbert
DEPUTY SHERIFF

FILED

NOV 12 1963

ALICE L. DICK, CLERK
REGISTER

Defendants Address
Phillipsville Road
Bay Minette Ala.

BOND

The State of Alabama, }
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, G. T. McGill

are held and firmly bound unto Willie Wynn

in the sum of Six hundred seventy-four and 84/100 DOLLARS,

to be paid to the said Willie Wynn

his

heirs, executors, administrators or assigns, for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators jointly, severally and firmly by these Presents.

Sealed with our seals, and dated this _____ day of November, 1963

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound G. T. McGill

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Willie Wynn

the sum of Three Hundred thirty-seven and 42/100 Dollars,

and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to J. A. Mothershead

summoning him to answer what he is indebted to said Defendant, or what effects of said Defendant has in his possession, or under his control; and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as he may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and laws of Alabama, and they hereby severally certify that they have property free from all incumbrance, to the full amount of the above bond.

B. T. McGill (Seal)

(Seal)

(Seal)

Approved this 12 day of November, A. D., 1963

Alvin J. Duck Clerk.

The State of Alabama }
Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared G. T. McGill *Kenneth Cooper*
as Attorney for G.T. McGill d/b/a G.T. McGill Grocery
who, being duly sworn, doth depose and say that Willie Wynn

is
indebted to him in the sum of \$347.42 Dollars,
and that he has commenced on suit by summons and complaint on said indebtedness
against the said Willie Wynn

and that J. A. Mothershead is
supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in his
possession, or under his control, and that he believe that process of Garnishment against the said
J. A. Mothershead

is necessary to obtain satisfaction of said claim; and that the said J. A. Mothershead
is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose
of vexing or harassing said Defendant, or other improper motives.

Sworn to and subscribed before me this November day of November 1963
Kenneth Cooper
Attorney for Plaintiff
_____, Clerk Circuit Court.

116

No. 5811

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT

Plaintiff

TO

Defendant

Bond and Affidavit in Garnishment
on Summons

Filed this _____ day of _____

19

Clerk.

Printed by Moore Ptg. Co.

State of Alabama
BALDWIN COUNTY

TO J. A. Mothershead

Defendant

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

G. T. McGill

Plaintiff

versus Willie Wynn

Defendant

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

J. A. Mothershead

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 12 day of November, 1946

J. A. Mothershead's address is:
Phillipsville Route
Bay Minette, Alabama

Alice J. Duck
Clerk of the Circuit Court.

64-11-12-63

5811

Received 12 day of Nov. 1963
and on 12 day of Nov. 1963
I served a copy of the within notice
on Willie Wynn
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert
10 miles north of B14

Sheriff claims 20 miles at
Ten Cents per mile Total 2-00
TAYLOR WILKINS, Sheriff
By W. A. Talbert
DEPUTY SHERIFF

W. A. Talbert, Sheriff
Birmingham, Alabama
J. A. McPherson, a Justice
of the Peace

Testimony to give

IN WITNESS WHEREOF I HAVE

signed my hand and seal

W. A. McPherson

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

TO
Willie Wynn

Plaintiff.....

VS.

Defendant.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, G. T. McGill, d/b/a G. T. McGill Grocery

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court of said County, against Willie Wynn

for the sum of \$347.42 Dollars and whereas, the said
G. T. McGill, d/b/a/ G. T. McGill Growery

has entered into bond, and made affidavit by law that the said Willie Wynn

is indebted to G. T. McGill, d/b/s G. T. McGill Grocery in the sum of \$347.42

Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that J.A. Mothershead

_____ is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said J.A. Mothershead

_____ to be and appear at the _____ December _____ term of the Circuit Court, to be holden for the County of Baldwin, on _____ 16th day of December 1963 _____, 19____ then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you will not be indebted to him in the future by a contract then existing, and whether by a contract then existing, you are liable to him 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 you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 12 day of November, 1963

64-11-12-63

Reinhardt Clerk.

No. 5811

Circuit Court of Baldwin County

G. T. McGill

VS.

Garnishment On Summons

Willie Wynn

Issued _____ day of _____, 19____

Plaintiff's Attorney

Received 12 day of Nov. 1963
on 12 day of Nov 1963
served a copy of the within Garn.
J. A. Motherhead

service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.

18 miles north of B.M.

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY W. A. Talbert
DEPUTY SHERIFF