## STATE OF GEORGIA COUNTY OF FULTON



Personally appeared before me, the undersigned attesting officer, duly authorized to administer oaths in the State and County aforesaid, E. W. WARRICK who, being duly sworn, deposes and says that he is Assistant Credit Manager of the firm of Gulf Oil Corporation and is authorized to make this affidavit; that he is familiar with the books and business of the firm of Gulf Oil Corporation, that the attached statement of account is true, that the debt is just; that the sum of \$406.28 is due and owing by Joe A. Morris
to the said Gulf Oil Corporation and remains unpaid; and that there are no just discounts, offsets, credits or counterclaims against said demands, either in law or equity; and that said sum is now due, exclusive of any payment, offsets, or usurious interest; and that lawful interest is due from 30 days after the date of each invoice.

Ewwarnen

Sworn to and this 26th	subscribed before day of March	me, 19 <u>63</u> .
Easter	iverp	



# Gulf Oil Corporation Box 7245, Station C, Atlanta 9, Ga.

March 26, 1963

Joe A. Morris P. O. Box 1586 Foley, Alabama

Petroleum	products, Services and/or	auto ac	cessories
purchased	upon presentation of Gulf	Credit	Card
	# 274-760-891		
at variou	Gulf Service Stations.		
	July 61	245	60
	Aug. 61	123	18
	Sept. 61	59	95
	Oct. 61	21	80
	Nov. 61	5	75
		456.	28
	Less Payments		
	Dec. 8 61	25	00
	March 8 62	25	00
		406	28
		· · · · · · · · · · · · · · · · · · ·	
		-	
	2,311.72		

## COMPLAINT

GULF OIL CORPORATION

PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW 5975

JOE A. MORRIS

DEFENDANT

I

The plaintiff claims of the defendant the sum of Four Hundred Six and 28/100(\$406.28)Dollars, due from him on account, to-wit: the 8th day of March, 1962, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant the sum of Four Hundred Six and 28/100(\$406.28)Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 8th day of March, 1962, 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 E.W. Warrick, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 8th day of March, 1962, and due at present.

The defendant lives at Foley, Alabama.

FILED

MAY 21 1985

ALICE I DUCK, CLERK REGISTER

SUMMONS AND COMPLAINT	
Circuit Court,	Baldwin County
The State of Alabama, Baldwin County.	TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA:	
Joe A. Morris	
You Are Hereby Commanded to Summon	
to appear and plead, answer or demur, within thirty days from the service l	nereof, to the complaint filed
answer or demur, within thirty days from the service	nereof, to the complaint filed
to appear and plead, answer or demur, within thirty days from the service left the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, ag	gainst_Joe A. MOTTIS
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, ag	gainst Joe A. WOTTIS, Defendant
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, ag	gainst Joe A. MOTTIS, Defendant
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, ag	painst Joe A. MOTTIS  Defendant  Plaintiff

		No. of the second second
No. 5578 Page		Defendant lives at
The State of Alabama Baldwin County		Foley, Alabama
CIRCUIT COURT		Received In Office
Gulf Oil Corporation		may 21 19.63
Plaintiffs	The second secon	I have executed this summons
vs.	Service and the service and th	this 25 _ m (m) 1969
Joe A. Morris	The state of the s	Joe a novem
Summons and Complaint		
Filed FILED 19_		
ALICE J. DUM, REGISTER Clerk		Sheriff claims 12 mile Total 5. 7. 20, Ten Cents Fer mile Total 5. Sheriff TAYLOR WILKINS, Sheriff
	The state of the s	DEPUTY STREET
James A. Brice		4
Plaintiff's Attorney	-	Jan las Wicken Sheriff
Defendant's Attorney	- Annual Control of the Control of t	Larlal Chen Deputy Sheriff
	Section and Control of the Control o	July

## JAMES A. BRICE

ATTORNEY AT LAW FOLEY, ALABAMA June 9, 1963

P.O.Box 298

WHITEHALL 3-3601

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

Re: Gulf Oil Corporation Vs: Joe A. Morris

At Law, No. 5578

Dear Mrs. Duck:

According to my records, plaintiff is entitled to judgment by default against defendant.

Please place the file before Judge Hall with the request that same be entered accordingly for \$\pmu06.28\$ together with \$\pmu32.50\$ interest, a total of \$\pmu38.78\$.

Please send me a certificate of judgment together with the cost bill.

Sincerely,

James A. Brice

JAB: 1gw

STATE OF ALABAMA )
COUNTY OF BALDWIN )

Personally appeared before me, a Sotary Public in and for said State and County, James A. Brice, who being duly sworm, deposes and saith that Gulf Oil Corporation, on the 15th day of July, 1963, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Joe A. Morris for the sum of Four Hundred Thirty-Eight and 78/100(\$438.78)Dellars and the further sum of Twenty-three and 70/100(\$23.70)Dellars cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that The Hale Manufacturing Company, 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 a yable in personal property.

James / Brice

Sworn to and subscribed before me on this 23rd day of July, 1963.

Notary Public

Baldwin County, Alakans

22124

## THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY. ALABAMA July 31, 1963

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: Gulf Oil Corporation
VS
Joe A. Morris

We as Garnishee in the above case wish to inform you that Joe A. Morris is employed by us and that we are indebted to him. As of Week Ending 8/4/63, we will deduct 25% out of his wages after taxes, sui and social security have been deducted.

We will be awaiting your cost bill. We have the following figures:

\$438.78 23.70 17.40

\$479.88

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

Sincerely yours,

THE HALE MANUFACTURING COMPANY

(Mrs.) Sue Blackerby

Office Manager

for file.

FILED

AUB 1 1963

Aug 1 1963

Aug 1 NICK CLERK REGISTER

#### LAW OFFICE OF JAMES A. BRICE

FOLEY. ALABAMA
July 25, 1963

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

Enclosures: Gulf Oil Corporation vs Joe Morris

- 1. Summons
- 2. Affidavit on Judgment
- 3. Garnishment on Judgment

"A LAWYER'S TIME AND ADVICE ARE HIS STOCK IN TRADE"
-A. LINCOLN

## 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 Gulf Oil Corporation, on the 15th day of July, 1963, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Joe A. Morris for the sum of Four Hundred Thirty-Eight and 78/100(\$438.78)Dollars and the further sum of Twenty-three and 70/100(\$23.70)Dollars cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that The Hale Manufacturing Company, 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 on this 23rd day of July, 1963.

Notary Public

Baldwin County, Alabama

Willey to Connect

STATE OF ALABAMA )
COUNTY OF BALDWIN )

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

TO ANY LAWFUL OFFICER OF SAID COUNTY\*\*\*\*\*GREETING:

WHEREAS, on the 15th day of July, 1963, being a regular day of said court, Gulf Oil Corporation recovered judgment against Joe A. Morris for the sum of Four Hundred Thirty-Eight and 78/100(\$438.78) Dollars, and cost of suit, Twenty-three and 70/100(\$23.70)Dollars, 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 company, vis: The Hale Manufacturing Company, a corporation, has or is believed to have in its possession, or under its control money or effects belonging to said defendant, or that it is, or is believed to be indebted to said 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 which is payable in personal peroperty.

YOU ARE THEREFORE HEREBY COMMANDED TO SUMMON The Hale Manufacturing Co mpany, a corporation, to be and appear before the Circuit Court for Baldwin County, Alabama, at the Court House thereof, in the City of day of wither 30 deuro \_1963, then Bay Minette, on the\_ and there to be and answer on oath, whether at the time of the service of the garnishment, or at the time of making its answer, or at any time intervening the time of serving 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 is liable to the defendant for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal peroperty, 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, Joe A. Morris.

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

No.	Witness,	Alice	J.	Duck,	Circuit	Clerk,	this 7 9 day	of July
1963	• 3	To parameter and the second				1	•	
ر	Tacitan	₹ <u>7</u>	en		DAY OF	//	las	1963

7-29-63

lect. Occh

Gulf Oil Corporation

Received 2 9 day of July 156

and on 2 2 day of July 156

I served a copy of the within 2 am

on Hale mpla. Co.

By service on 2 and a service of the servic

GULF OIL CORPORATION,

PLAINTIFF

٧s

JOE A. MORRIS

DEFENDANT

THE HALE MANUFATURING COMPANY, a corporation

GARNISHEE

TO ANY LAWFUL OFFICER OF SAID COUNTY,

You are hereby commanded to notify Joe A. Morris that on the 27 day of 1963, a Writ of Garnishment in the above stated case was issued to The Hale Manufaturing Company, a corporation, as Garnishee.

And you will return this Writ according to law.

WITNESS	my	hand	this	29	_day	of	-free	es .	, 1963	3 <b>-</b>
				-		. • (	) (			
							alue	· 1.	Due	er c
						***	Mrs. A	li⁄ce/J.	Duck	
							Circui	t Cíerk	:	

Received	in	this	office	the d	day day	of	Mul	2	 ,19	963.
							a	-0	 	
Combine of this Estimate of the Control of the Cont	quantity	, when	analysis alkilomanana mendamenina kiloni a	and broken and the coll	ariii ka magamariw	ananima din 1000			 garanti ray	

Officer

Executed by serving a copy of the within writ on the day of August, 1963.

Ten Cents per mile Total 3 7000

NAYLOR WILKINS Cherifa

Dolly

Berton de regionales La companya de La companya de La companya de La companya de companya de La companya de companya de companya de La companya de com Auf Dil Company

	=RELEASE OF GARNIS	SHMENT
Cou:	rt of <u>Baldwin</u>	County, Alabama
RE:GULF OI	L CORPORATION	
	Vs.	Plaintiff.
JOE A.	MORRIS	
		Defendant.
To: Hale Manufac	turing Company	GARNISHEE
		G. 201122
I, Alice J. Duck bama, do hereby certify that in the been discharged.	Clerk of the <u>Circuit</u> e above styled case, Garnis	Court of <u>Baldwin</u> County, Ala- hment has been released and Garnishee has
Witness my hand, this the_	8th day of Janua	ary , 19 <u>64</u>
	204 - 21	ice Duck, CLERK.