

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon L. E. BROWDER 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, Alabama, at the place of holding same by GEORGE WILSON.

*March 4 - 1964*

*Allice L. Duck*  
Clerk

\* \* \* \* \*

COMPLAINT

GEORGE WILSON,

PLAINTIFF

VS:

L. E. BROWDER,

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

*5960*

The Plaintiff claims of the Defendant SIX HUNDRED SEVENTY-TWO & 00/100 DOLLARS (\$672.00), due by promissory note made by him on the 3rd day of March, 1962, and payable on the 3rd day of September, 1962, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00).

The Plaintiff is filing an attachment and garnishment in this case.

*Wm. C. Miller*  
Attorney for Plaintiff

Defendant's Address:

L. E. Browder  
700 Bay Blvd.  
East Pensacola Heights  
Pensacola, Florida

FILED  
MAR 4 1964  
ALICE L. DUCK, CLERK  
RECORDED

5960

Returned 4 day of Mar 19 64

Not found in my county after diligent search and inquiry. J. E. Browder

Taylor Wilkins, Sheriff

By

Childress

Deputy Sheriff

SUMMONS

GEORGE WILSON,

PLAINTIFF,

VS:

L. E. BROWDER,

DEFENDANT

FILED  
MAR 4 1964  
ALICE J. BUCK, CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

THE STATE OF ALABAMA,  
Baldwin County.

FILED 3-26-64 9:10 AM  
 Recorded Judy book 14 page 197  
 and I certify that the following Privilege Tax  
 has been paid  
 Deed Tax \_\_\_\_\_  
 Mortgage Tax \_\_\_\_\_  
L. O. Owen Jr.  
 Judge of Probate  
 By NH

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, FOREST A. CHRISTIAN, as Attorney for GEORGE WILSON

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that

L. E. BROWDER

is justly indebted to the Plaintiff GEORGE WILSON

in the sum of ONE THOUSAND ONE HUNDRED & 00/100 (\$1,100.00) Dollars, and  
FOREST A. CHRISTIAN, his attorney no  
 being because the Defendant is a non-resident, ~~and~~ bond  
~~is~~/required by law, in such cases/you are hereby commanded to attach so much of the estate of

L. E. BROWDER

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said County, ~~or within thirty days~~ ~~Monday~~~~xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx~~~~19--~~ next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 17 day of March A. D., 19 64.

NOTE TO SHERIFF: Please attach a certain real estate mortgage made from William C. Davis and wife Roma E. Davis to L. E. Browder which mortgage is recorded in mortgage book 410, page 320. You probably will attach this mortgage by filing this attachment in the probate office and have the probate clerk make a note on the mortgage record of the filing of this attachment. William C. Davis lives at Magnolia Springs, Alabama, on the old Browder place.

Weyt - N.F.  
EX-3-26-64

BOOK 014 PAGE 197

Executed March 26, 1964 by  
recording this attachment in  
the Probate Office.

Def t. is not found in this  
county.

*Myler Wilkins*  
*Shiriff*

*Recording fee \$5.50*

No. *5960*

**ATTACHMENT**

*George Wilkins*

Vs. { **ATTACHMENT**

*L. E. Browder*

Issued \_\_\_\_\_, 19\_\_\_\_

Moore Printing Co.

*R. 50*  
*Shiriff Dept.*

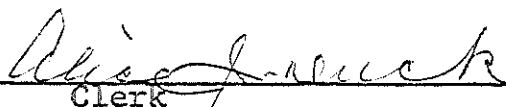
NOTICE TO NON-RESIDENT DEFENDANT

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

You are hereby notified that on the 16 day of March, 1964, the Sheriff of Baldwin County, Alabama, executed a certain writ of attachment issued out of the Circuit Court of Baldwin County, Alabama, in that certain cause wherein GEORGE WILSON was Plaintiff and L. E. BROWDER was Defendant, by levying upon the following described property as property of the said Defendant:

The East half of Section 29, and the South half of the Northwest Quarter of the North sixty-six acres of the West half of the Southwest Quarter of Section 28, Township 7 South, Range 3 East.

And also attaching that certain real estate mortgage executed by WILLIAM C. DAVIS and wife, ROMA E. DAVIS to said L. E. BROWDER, which mortgage is recorded in Mortgage Book 410, page 320.

  
Clerk  
Baldwin County, Alabama

Forest A. Christian, Attorney

BALDWIN TIMES: Please publish for three successive weeks.

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P. O. DRAWER 190  
AREA CODE 205 -- PHONE 943-2201  
FOLEY, ALABAMA 36535

March 9, 1966

Hon. Telfair Mashburn  
Circuit Judge  
Bay Minette, Alabama

Re: George Wilson  
Vs: L. E. Browder  
Case No. 5960

Dear Judge Mashburn:

Although this case is old, it needs to remain on the docket. The Defendant lives in Pensacola and the Plaintiff has a promissory Note.

The Defendant sold some property in Baldwin County and he took a purchase money mortgage, which is of record and we have filed a lis pendens. The Defendant assigned the note to secure another indebtedness. The original mortgage was for \$41,000.00 which note was assigned to J. J. Jurkiewicz to secure a loan for \$10,000.00.

Borth Mr. Davis who gave the mortgage and J. J. Jurkiewicz who took an assignment know of this but we have to wait until the \$10,000.00 is paid.

Accordingly, kindly keep this case on the docket even though it is old.

Cordially yours,



FOREST A. CHRISTIAN  
—ON ALABAMA'S BEAUTIFUL GULF COAST—

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon L. E. BROWDER 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, Alabama, at the place of holding same by GEORGE WILSON.

*March 4, 1964*

*George Wilson*  
Clerk

\* \* \* \* \*

COMPLAINT

GEORGE WILSON,

PLAINTIFF

VS:

L. E. BROWDER,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant SIX HUNDRED SEVENTY-TWO & 00/100 DOLLARS (\$672.00), due by promissory note made by him on the 3rd day of March, 1962, and payable on the 3rd day of September, 1962, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00).

The Plaintiff is filing an attachment and garnishment in this case.

*Walter C. Allen*  
Attorney for Plaintiff

Defendant's Address:

L. E. Browder  
700 Bay Blvd.  
East Pensacola Heights  
Pensacola, Florida

FILED

MAR 4 1964

ALICE I. DICK, CLERK  
RECEIVED

ATTACHMENT

THE STATE OF ALABAMA,  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, FOREST A. CHRISTIAN, as Attorney for GEORGE WILSON

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that

L. E. BROWDER

is justly indebted to the Plaintiff GEORGE WILSON

in the sum of ONE THOUSAND ONE HUNDRED & 00/100 (\$1,100.00) Dollars, and

FOREST A. CHRISTIAN, his attorney <sup>NO</sup> having made affidavit and ~~and~~ bond <sup>being</sup> because the Defendant is a non-resident, ~~is~~ required by law, in such cases, ~~you are~~ hereby commanded to attach so much of the estate of

L. E. BROWDER

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said County, ~~on within thirty days~~ Monday of ~~1964~~ next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 14 day of March A. D., 1964.

Alice J. Duck Clerk.

NOTE TO SHERIFF: Please attach a certain real estate mortgage made from William C. Davis and wife Roma E. Davis to L. E. Browder which mortgage is recorded in mortgage book 410, page 320. You probably will attach this mortgage by filing this attachment in the probate office and have the probate clerk make a note on the mortgage record of the filing of this attachment. William C. Davis lives at Magnolia Springs, Alabama, on the old Browder place.



FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

October 24, 1967

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama 36507

Re: George Wilson  
Vs: L. E. Browder  
Case No. 5960

Dear Mrs. Duck:

Enclosed you will find a Motion for Decree Pro Confesso on Publication. This is an old case on the docket. It seems that I did this about the time I had my eye surgery and I find in my file a copy of a Notice to Non-Resident Defendant with note to the Foley Onlooker to publish for three successive weeks.

Would you see whether this has been published and if so, please execute the Motion and present to Court with the enclosed promissory waive note.

It appears that the principal amount is \$672.00 with interest at 8% for 5½ years or \$296.78 interest, plus \$150.00 Attorney's fee, for a total of \$1,118.78.

I know that we will all be gald to get this old case off the docket.

Cordially yours,



FOREST A. CHRISTIAN

# The Baldwin Times

"Baldwin's Only All County Newspaper"

BAY MINETTE, ALABAMA

J. H. FAULKNER, Publisher

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

J. H. Faulkner, Jr., being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to non-resident

Geo. Wilson vs. L. E. Browder

### NOTICE TO NON-RESIDENT DEFENDANT STATE OF ALABAMA BALDWIN COUNTY

You are hereby notified that on the 26th day of March, 1964, the Sheriff of Baldwin County, Alabama, executed a certain writ of attachment issued out of the Circuit Court of Baldwin County, Alabama, in that certain cause wherein GEORGE WILSON was Plaintiff and L. E. BROWDER was Defendant, by levying upon the following described property as property of the said Defendant:

The East half of Section 29, and the South half of the Northwest Quarter of the North sixty-six acres of the West half of the Southwest Quarter of Section 28, Township 7 South, Range 3 East.

And also attaching that certain real estate mortgage executed by WILLIAM C. DAVIS and wife, ROMA E. DAVIS to said L. E. BROWDER, which mortgage is recorded in Mortgage Book 410, page 320.

ALICE J. DUCK, Clerk  
Baldwin County, Alabama

FOREST A. CHRISTIAN

Attorney

44-3c

### COST STATEMENT

WORDS @ \_\_\_\_\_ cents \_\_\_\_\_ \$ 17.00  
I hereby certify this is correct, due and unpaid (paid).

J. H. Faulkner, Jr.  
Editor.

was published in said newspaper for 3 consecutive weeks in the following issues:

Date of 1st publication Nov. 2, 1967 Vol. 78 No. 44

Date of 2nd publication Nov. 9, 1967 Vol. 78 No. 45

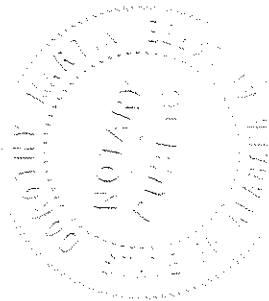
Date of 3rd publication Nov. 16, 1967 Vol. 78 No. 46

Date of 4th publication \_\_\_\_\_, 19\_\_\_\_ Vol. \_\_\_\_\_ No. \_\_\_\_\_

Subscribed and sworn before the undersigned this 16 day of Nov, 1967

Dorothy Martin  
Notary Public, Baldwin County.

J. H. Faulkner, Jr.  
Editor.



FILED  
NOV 17 1967  
BALDWIN COUNTY, ALABAMA

The State of Alabama,

Baldwin County

CIRCUIT COURT, IN EQUITY

No. 5960

Term, 19

GEORGE WILSON

Complainant

L. E. BROWDER

Defendant

In this cause it appears to the Clerk  
Register Alice J. Duck that the order of publication  
heretofore made in this cause, was published for four consecutive weeks, commencing on the 2nd  
day of November, 1967, in the Baldwin Times a newspaper published  
in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in  
Baldwin County, on the day of 19, and

And it now further appearing to the Clerk  
Register Alice J. Duck, that the said  
L. E. Browder

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is  
now, therefore, on motion of Plaintiff  
Complainant, ordered and decreed by the Clerk  
Register Alice J. Duck  
that the Bill of Complaint in this cause be, and it hereby is in all things taken as  
confessed against the said L. E. Browder

This 27th day of December 1967

48

Alice J. Duck Register

BOND

The State of Alabama, }

Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, \_\_\_\_\_

are held and firmly bound unto \_\_\_\_\_

in the sum of \_\_\_\_\_ DOLLARS,

to be paid to the said \_\_\_\_\_

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 \_\_\_\_\_, 19\_\_\_\_

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

ha\_\_\_\_\_ commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said \_\_\_\_\_

the sum of \_\_\_\_\_ Dollars,

and ha\_\_\_\_\_ on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

summoning h\_\_\_\_\_ to answer what \_\_\_\_\_ indebted to said Defendant, or what effects of said Defendant \_\_\_\_\_ ha\_\_\_\_\_ in \_\_\_\_\_ possession, or under \_\_\_\_\_ 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 \_\_\_\_\_ 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 \_\_\_\_\_ hereby severally certify that \_\_\_\_\_ have property free from all incumbrance, to the full amount of the above bond.

\_\_\_\_\_  
(Seal)

\_\_\_\_\_  
(Seal)

\_\_\_\_\_  
(Seal)

Approved this \_\_\_\_\_ day of \_\_\_\_\_ A. D., 19\_\_\_\_

\_\_\_\_\_  
Clerk.

The State of Alabama  
Baldwin County

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

in and for said County, personally appeared FOREST A. CHRISTIAN

who, being duly sworn, doth depose and say that L. E. BROWDER

indebted to GEORGE WILSON in the sum of ONE THOUSAND ONE HUNDRED & 00/100 Dollars,  
and that GEORGE WILSON has commenced on suit by summons and complaint on said indebtedness  
against the said L. E. BROWDER a non-resident and residing at 700 Bay Blvd.,  
East Pensacola Heights, Pensacola, Florida  
and that WILLIAM C. DAVIS of Magnolia Springs, Alabama

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 believes that process of Garnishment against the said  
WILLIAM C. DAVIS

is necessary to obtain satisfaction of said claim; and that the said WILLIAM C. DAVIS  
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.

Forest A. Christian

Sworn to and subscribed before me this 4 day of March 1964.

Alice J. Duck, Clerk Circuit Court.

116

No.	THE STATE OF ALABAMA Baldwin County.	CIRCUIT COURT	Plaintiff	TO	Defendant	Bond and Affidavit in Garnishment on Summons	Filed this day of	19	Clerk.
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The State of Alabama,  
Baldwin County.

CIRCUIT COURT, IN EQUITY  
No. 5960      October      Term, 1967.

GEORGE WILSON

Complainant

Vs.

L. E. BROWDER

Defendant

Motion is hereby made for a Decree Pro Confesso against L. E. BROWDER

Defendant

in the annexed stated cause on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 25th day of October 1967

746 Code



Solicitor.

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P. O. DRAWER 190  
AREA CODE 205 - PHONE 943-2201  
FOLEY, ALABAMA 36535

April 28, 1969

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama 36507

Re: George Wilson  
Vs: L. E. Browder  
Case No. 5960½

Dear Mrs. Duck:

The above case has been settled between the parties. Please send any cost bill to me.

Cordially yours,



FOREST A. CHRISTIAN

State of Alabama

BALDWIN COUNTY

TO L. E. BROWDER, Defendant:

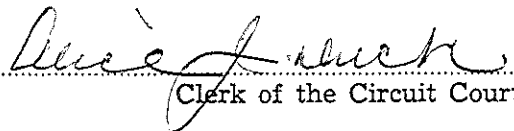
YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of.....

GEORGE WILSON, Plaintiff,versus L. E. BROWDER, Defendant.

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

W. C. DAVIS and ROMONA E. DAVIS of Magnolia Springs, Alabama

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 24day of January, 1946  
Clerk of the Circuit Court.



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 .....FOREST A. CHRISTIAN.....

who being duly sworn, on oath says, that a regular December, 1967 Term  
of the Circuit Court of Baldwin County, to-wit: on the .....28th..... day of December.....

1967..... GEORGE WILSON.....  
recovered a judgment against L. E. BROWDER for the sum of ONE THOUSAND SIXTY-EIGHT &  
78/100 DOLLARS (\$1068.78), plus \$63.25 Court costs, for a total ~~for the sum of~~  
of ONE THOUSAND ONE HUNDRED THIRTY-TWO & 13/100 (\$1,132.13) - - - - - Dollars

~~besides costs of suit~~; that said judgment remains wholly unsatisfied and in full force and effect: that .....  
.....W. C. DAVIS and ROMONA E. DAVIS of Magnolia Springs, Alabama.....

supposed to be indebted to or have effects of the said L. E. BROWDER  
in .....his..... possession, or under .....his..... Control, and that he believes process of  
Garnishment against said W. C. DAVIS and ROMONA DAVIS of Magnolia Springs, Alabama, ...  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this .....22.....  
day of .....January..... A. D. 1967.....

*Alice J. Duck*  
Clerk.

*Forest A. Christian*  
Forest A. Christian

State of Alabama

BALDWIN COUNTY

TO L. E. BROWDER, Defendant:

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

GEORGE WILSON, Plaintiff,versus L. E. BROWDER, Defendant,

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

W. C. DAVIS and ROMONA E. DAVIS of Magnolia Springs, Alabama

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this 22day of January, 1946W. C. Davis  
Clerk of the Circuit Court.

CLERK  
REGISTER

The State of Alabama,

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

January TERM, 1968...

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular December Term, 1967, of the Circuit Court of Baldwin County, to-wit: On the 28th day of December, 1967, being a regular day of said term, GEORGE WILSON

recovered judgment against L. E. BROWDER for the sum of ONE THOUSAND SIXTY-EIGHT & 78/100 DOLLARS (\$1,068.78), plus \$63.25 Court costs, for a total of ONE THOUSAND ONE HUNDRED THIRTY-TWO & 13/100 DOLLARS ~~for the sum of (\$1,132.13)~~ ~~Dollars and cost of suit~~

and affidavit having been made by FOREST A. CHRISTIAN that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

W. C. DAVIS and ROMONA E. DAVIS of Magnolia Springs, Alabama

has or is believed to have in their possession, or under their control money or effects belonging to said defendant L. E. BROWDER or that they are ~~six~~ or is believed to be indebted to said defendant ~~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 W. C. DAVIS and ROMONA E. DAVIS, of Magnolia Springs, Alabama

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 thirty days ~~on the Monday in A-D-19~~ 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 making their answer, or at any time intervening the time of serving the garnishment, and making the answer they was ~~indebted to said defendant~~ ~~and whether they will not be indebted in future to said defendant~~ ~~by a contract then existing, and whether by a contract then existing they~~ 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 they has not in their possession or under their control money or effects belonging to the defendant L. E. BROWDER.

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

Witness, ALICE J. DUCK, Clerk of said Court, this    day of January, A. D., 1968.

Issued 22 day of January, A. D., 1968.

ATTEST:

Alice J. Duck, Clerk.

Ex: 1-30-68

CIRCUIT COURT, BALDWIN COUNTY

Received 22 day of Jan 1968  
at 30 day of Jan 1968

No. 5960 1/2

Served a copy of the within Garn.  
W.C. Davis &  
Romona E. Davis  
By service on above

George Wilson

TAYLOR WILKINS, Sheriff

By J. M. Eastman  
Magnolia Springs  
Fla.

VS. } GARNISHMENT ON JUDGMENT

L. E. Browder  
W.C. Davis & Romona E. Davis  
Garnish

Sheriff claims 172 miles at 8.6  
Cents per mile Total \$ 8.62 / 17.20

TAYLOR WILKINS, Sheriff

J. M. Eastman  
DEPUTY SHERIFF

Issued \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

F. L. Hunter  
Attorney

ANSWER TO GARNISHMENT ON JUDGMENT

GEORGE WILSON,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	
	X	AT LAW
L. E. BROWDER,	X	
	X	CASE NO. 5960
DEFENDANT,	X	
W. C. DAVIS and ROMONA E.	X	
DAVIS,	X	
GARNISHEES.	X	

WHEREAS, GEORGE WILSON has a judgment against the Defendant, L. E. BROWDER, for ONE THOUSAND SIXTY-EIGHT & 78/100 DOLLARS (\$1,068.78), plus Court costs and interest, and

WHEREAS by GEORGE WILSON'S attorney, FOREST A. CHRISTIAN, the Plaintiff has garnisheed W. C. DAVIS and ROMONA E. DAVIS of Magnolia Springs, Alabama, and

WHEREAS, said W. C. DAVIS and ROMONA E. DAVIS admit that they owe on the balance of the real estate mortgage dated December 10, 1963, recorded in Mortgage Book 410, page 320-322, a principal balance of approximately SIXTEEN THOUSAND NINE HUNDRED & 00/100 DOLLARS (\$16,900.00), and

WHEREAS, this mortgage was assigned to JOHN J. JURKIEWICZ for collateral security for the payment of TEN THOUSAND & 00/100 DOLLARS (\$10,000.00), and

WHEREAS, no part of this TEN THOUSAND DOLLARS has yet been paid, only approximately FIVE HUNDRED DOLLARS which was half year's interest and it is further appearing that there will be a principal balance due after paying the TEN THOUSAND DOLLARS to JURKIEWICZ, of approximately SIX THOUSAND & 00/100 DOLLARS, and

WHEREAS, said W. C. DAVIS and ROMONA E. DAVIS have been served with garnishment on judgment, and

WHEREAS, the annual payments due under said original mortgage was FOUR THOUSAND EIGHT HUNDRED & 00/100 DOLLARS (\$4,800.00), and

WHEREAS, said W. C. DAVIS and ROMONA E. DAVIS may make advance

Answer to Garnishment on Judgment-Wilson VS: Browder-W.C.Davis-Case No.5960

payments, this garnishment should be held in suspense until February 1, 1969.

THEREFORE, the said W. C. DAVIS and ROMONA E. DAVIS, do hereby acknowledge and understand that they are to make no payments to L. E. BROWDER, the Defendant, until this garnishment is paid in full and that before making any payments, that they should confer with the Plaintiff's attorney, FOREST A. CHRISTIAN.

Dated this the 5th day of February, 1968.

W C Davis (SEAL)  
W. C. Davis

Romona E. Davis (SEAL)  
Romona E. Davis

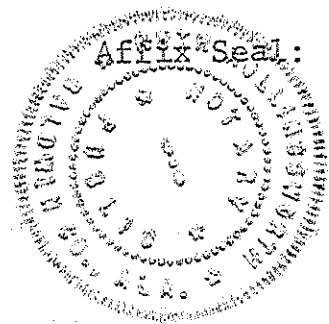
GARNISHEES.

STATE OF ALABAMA, )

COUNTY OF BALDWIN. )

I, the undersigned Notary Public, in and for said County and State, do hereby certify that W. C. DAVIS and ROMONA E. DAVIS, whose names are signed to the foregoing Answer to Garnishment on Judgment, and who are known to me, acknowledged before me on this day that, being informed of the contents of the said instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 5th day of February, 1968.



Ruth Hallingsworth  
Notary Public, Baldwin County, Alabama  
Commission Expires: Mar. 2, 1970

FILED

FEB 12 1968

ALICE J. DUCK CLERK  
REGISTER

The State of Alabama,  
Baldwin County.

CIRCUIT COURT, IN EQUITY

No. 5960

December

Term, 19. 67

GEORGE WILSON

Complainant.

Vs.

L. E. BROWDER

Defendant.

Motion is hereby made for a Decree Pro Confesso against L. E. BROWDER

Defendant.

in the annexed stated cause on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 27th day of December, 19. 67

746 Code

*[Signature]*

Solicitor.