

UNIVERSAL C.I.T.	)	IN THE CIRCUIT COURT OF
CREDIT CORPORATION	)	BALDWIN COUNTY, ALABAMA
a corporation,	)	AT LAW.
Plaintiff	)	
-VS-	)	
FREDDIE LEE SCOTT	)	
Defendant	)	
	)	

5905

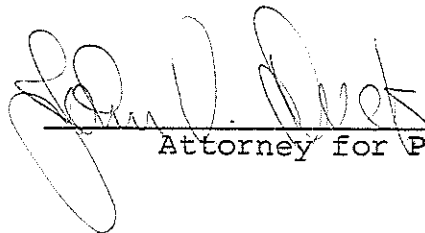
COUNT ONE:

Plaintiff claims of the Defendant the sum of SIX HUNDRED SIXTY-THREE and 80/100 DOLLARS(\$663.80), for damages, for the breach of a written contract, entered into by the Defendant on to-wit the 27th day of March, 1963, by which he promised to pay' to the Plaintiff the sum of Forty-five Dollars (\$45.00),commencing on to-wit, the 27th day of April, 1963 with a like or similar sum for twenty-three (23) consecutive payments thereafter for the full purchase price of an automobile, said written instrument provided that in the event of a default in said payment, the entire balance would then become due and payable, and the Plaintiff could seize said automobile and sell the same at a public or private sale, with or without advertisement, with or without notice to the Defendant, and apply the proceeds of said sale to the remainder due under the said written instrument, and in the event of a deficiency the defendant agreed to pay the amount of said deficiency. Plaintiff alleges that the Defendant breached the said written instrument by defaulting on the said monthly payments, leaving a balance of principal due of One Thousand Eighty Dollars (\$1,080.00); that the automobile mentioned therein was seized and sold for the sum of Two Hundred and Fifty Dollars (\$250.00) and after crediting the Defendant the sum of One Hundred Sixty-six and 20/100 (\$166.20), as a refund on the said insurance, the balance due by deficiency owed by the Defendant of the sum of Six Hundred Sixty-Three and 80/100 Dollars (\$663.80).

That in and by the terms of said instrument, the Plaintiff waived all rights of exemptions under the Constitution and

laws of the State of Alabama, and the Plaintiff now claims the benefit of said waiver.

That in and by the terms of the said written instrument, the Defendant promised to pay a reasonable Attorneys fee, if the indebtedness secured be placed in the hands of an Attorney for collection and the Plaintiff claims the further and additional sum of One Hundred Thirty-Five Dollars (\$135.00) as a reasonable Attorney's fee.

  
Attorney for Plaintiff

Deft. may be served at  
Box 651, Foley, Alabama  
or at the South Baldwin  
Hospital, Foley, Alabama

**FILED**

JAN 27 1984

ALICE I. DUK CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5905

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon FREDDIE LEE SCOTT

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

FREDDIE LEE SCOTT

Defendant

by UNIVERSAL C.I.T. CREDIT CORPORATION, a corporation

Plaintiff

Witness my hand this

27

day of

January 1964

Alice J. Duck

Clerk

64-2-1-64

## STATE of ALABAMA

Baldwin County

## CIRCUIT COURT

UNIVERSAL C.I.T. CREDIT CORPORATION

A Corporation

Plaintiffs

vs.

FREDDIE LEE SCOTT

Defendants

## Summons and Complaint

FILED

Filed 19

JAN 27 1964

Clerk

ALICE J. DUCK, CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Box 651 Foley, Alabama  
or South Baldwin Hospital  
Foley, Alabama  
Received In OfficeJan. 27, 1964  
Taylor Wilkins

Sheriff.

I have executed this summons

this 1<sup>st</sup> day of Jan 1964

by leaving a copy with

Freddie Lee Scott

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS Sheriff

BY

Eastburn  
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

J. M. Eastburn

Deputy Sheriff.

Foley, Ala.

SOUTH BALDWIN HOSPITAL

P. O. DRAWER 610  
FOLEY, ALABAMA

GEORGE C. SCHNEIDER  
ADMINISTRATOR

March 10, 1965

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

Re: Case # 5905½  
Freddie Lee Scott

Dear Mrs. Duck:

This is to advise you that the above named is still employed at the South Baldwin Hospital and that as long as he is employed we will deduct the required 25% of his gross earnings and remit to you on a monthly basis.

Please advise if there is any further action on the Hospital's part.

Yours truly,

  
George C. Schneider  
Administrator

GCS:oeb

FILED  
MAR 15 1965  
FBI - BALDWIN

# SOUTH BALDWIN HOSPITAL

P. O. DRAWER 610  
FOLEY, ALABAMA

GEORGE C. SCHNEIDER  
ADMINISTRATOR

June 15, 1965

Re: Freddie Lee Scott  
Case No. 5905½

Alice J. Duck  
Circuit Clerk  
Bay Minette, Ala.

Dear Mrs. Duck:

This is to notify you that Freddie Lee Scott is no longer employed  
by the South Baldwin Hospital.

Yours truly,

*Mrs. Guida Boutwell*  
Guida Boutwell  
Bookkeeper

FILED

JUN 17 1965

Alice J. Duck, Clerk  
REGISTER

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 JOHN V. DUCK

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

of the Circuit Court of Baldwin County, to-wit: on the 19th day of May

19 64, UNIVERSAL C.I.T. CREDIT CORP., a corp.

recovered a judgment against FREDDIE LEE SCOTT

\_\_\_\_\_ for the sum of

SEVEN HUNDRED NINETY-EIGHT AND NO/100 - - - - - Dollars

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

SOUTH BALDWIN HOSPITAL, Foley, Alabama,

supposed to be indebted to or have effects of the said FREDDIE LEE SCOTT

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

Garnishment against said SOUTH BALDWIN HOSPITAL, Foley, Alabama,

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 23

day of February A. D. 19 65

Alice J. Duck  
Clerk.

John V. Duck

STATE OF ALABAMA

Baldwin County

TO FREDDIE LEE SCOTT, Defendant.....:

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

UNIVERSAL C.I.T. CREDIT CORP., a corp., Plaintiff.....,

versus FREDDIE LEE SCOTT, Defendant.....,

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

SOUTH BALDWIN HOSPITAL, Foley, Alabama

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 23

.....day of Feb, 1965

EX-2-24-65

Clerk of the Circuit Court.



03/

MA 590512

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Received 23 day of Feb 1965  
and on 24 day of Feb 1965  
served a copy of the within Notice  
on Fred Lee Scott

by service on Chow

TAYLOR WILKINS, Sheriff  
By Jm Easton D.S.  
Foley, Ala

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff  
BY Jm Easton  
DEPUTY SHERIFF

Universal C. & I. Credit Corp

Plaintiff....

VS.

Fred Lee Scott

Defendant....

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 Term, 19, of the Circuit Court of Baldwin County,  
to-wit: On the 19th day of May, 1964, being a regular day of  
said term, UNIVERSAL C.I.T. CREDIT CORP., a corp.

recovered judgment against FREDDIE LEE SCOTT

for the sum of SEVEN HUNDRED NINETY-EIGHT AND NO/100 Dollars, and cost of suit,  
and affidavit having been made by JOHN V. DUCK  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

SOUTH BALDWIN HOSPITAL, Foley, Alabama,

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 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 SOUTH BALDWIN HOSPITAL,

Foley, 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 Eay Minette, on the Monday in A. D. 19, 1965,  
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 its 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 ot  
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 FREDDIE LEE SCOTT

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

Witness, ALICE J. DUCK, Clerk of said Court, this 23 day of Feb, A. D., 1965

Issued 23 day of Feb, A. D., 1965

ATTEST:

Alice J. Duck, Clerk.

and on 24 day of Feb 1960  
served a copy of this within Garn on judgment  
on Mr. Schindler (Mgr.) of  
South Baldwin Hospital  
by service on Mr. Schindler

TAYLOR WILKINS, Sheriff  
Jm Eastland  
Foley, Ala.

Sheriff claims 7.2 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY Jm Eastland  
DEPUTY SHERIFF

Circuit Court, Baldwin County

No. \_\_\_\_\_

VS. } Garnishment On Judgment

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

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

Attorney

The State of Alabama,

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

MAY

TERM, 19.64..

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular.....May..... Term, 19.64., of the Circuit Court of Baldwin County, to-wit: On the .....22nd.....day of.....May....., 19.64., being a regular day of said term, .....UNIVERSAL C.I.T. CREDIT CORP., a corporation,.....

recovered judgment against .....FREDDIE LEE SCOTT.....

for the sum of ...SEVEN HUNDRED NINETY-EIGHT ..... Dollars, and cost of suit, and affidavit having been made by .....JOHN V. DUCK..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

*Magnolia* ~~LAND COMPANY~~ LAND COMPANY, Foley, Alabama.....

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 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 .....

*Magnolia* ~~LAND COMPANY~~ LAND 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.....*within 30 days*..... 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.....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, 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.....FREDDIE LEE SCOTT.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....*14*..... day of.....*Nov*..... A. D., 19*66*..

Issued .....*14*..... day of .....*Nov*..... A. D., 19*66*..

ATTEST:

*Alice J. Duck*....., Clerk.

EX-11-18-66

Received 14 day of Nov. 1946  
and on 18 day of Nov. 1946

served a copy of the within Ham.

~~Ham.~~ Land Co.  
Magnolia Land Co.

By service on Betty Singleton Secretary

TAYLOR WILKINS, Sheriff

J. M. Eastman  
Foley, Ala.

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

BY J. M. Eastman  
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 5905 1/2

Universal Credit Corp.

VS. } GARNISHMENT ON JUDGMENT

Freddie Lee Scott

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

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

Attorney

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

WATERFRONT PROPERTY  
SUBDIVISIONS  
TOWN LOTS

FARM LANDS FOR LEASE  
BUSINESS SITES  
(WITH OR WITHOUT  
IMPROVEMENTS)

## *The Magnolia Land Company*

MAIN OFFICE  
PHONE WH 3-8281

413 SOUTH MCKENZIE STREET  
FOLEY, ALABAMA 36535

HIGHWAY SALES OFFICE  
PHONE WH 3-7505

November 22, 1966

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

Dear Mrs. Duck:

On Saturday, November 19th, I delivered to Freddie Lee Scott notice of Garnishment on Judgment as delivered to me at this office by Joe Eastburn.

As I expected, Freddie Lee Scott quit.

Very truly yours,

THE MAGNOLIA LAND COMPANY

*Betty Singleton*  
(Mrs.) Betty Singleton

/b

FILED

NOV 25 1966

ALICE J. DUCK, CLERK  
REGISTER

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

5905 1/2

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State  
aforesaid JOHN V. DUCK

who being duly sworn, on oath says, that a regular May Term  
of the Circuit Court of Baldwin County, to-wit: on the 22nd day of May  
19 64, UNIVERSAL C.I.T. CREDIT CORP.

recovered a judgment against FREDDIE LEE SCOTT  
for the sum of  
SEVEN HUNDRED NINETY-EIGHT Dollars

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

supposed to be indebted to or have effects of the said FREDDIE LEE SCOTT  
in its possession, or under its Control, and that he believes process of  
Garnishment against said MAGNOLIA LAND COMPANY  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 14  
day of Nov A. D. 1966  
Alice J. Duck  
Clerk.

John V. Duck

STATE OF ALABAMA

Baldwin County

TO FREDDIE LEE SCOTT, Defendant.....

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

UNIVERSAL C.I.T. CREDIT CORP., Plaintiff.....versus FREDDIE LEE SCOTT, Defendant.....

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

*Magnolia* ~~LAND~~ LAND COMPANY

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

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

14 day of Nov, 1966*Alice J. [Signature]*  
Clerk of the Circuit Court.



Received 14 day of Nov 1966

on 18 day of Nov 1966

received a copy of the within Notice

of Freddie Lee Scott

by service on Alouse

TAYLOR WILKINS, Sheriff

By J. M. Eastman  
Goley, Ala.

D. S.

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY J. M. Eastman  
DEPUTY SHERIFF

59054

## NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Universal P.I. Credit Co.

Plaintiff.....

VS.

Freddie Lee Scott

Defendant.....