

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons NORMAN J. CURRIER, 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 MID-SOUTH CHEMICAL CORPORATION.

Witness my hand this the 4 day of August, 1964.

Alice L. Duck  
Clerk

\* \* \* \* \*

COMPLAINT

MID-SOUTH CHEMICAL  
CORPORATION,

PLAINTIFF,

VS:

NORMAN J. CURRIER,

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

6139

The Plaintiff claims of the Defendant THREE THOUSAND TWO HUNDRED THIRTY-SIX & 78/100 DOLLARS (\$3,236.78), due by promissory note made by him on the 29th day of January, 1963, and payable on the 1st day of June, 1963, with interest thereon.

Said note provides for a reasonable attorney's fee, which the Plaintiff alleges to be FOUR HUNDRED EIGHTY & 00/100 DOLLARS (\$480.00).

Miller Blum  
Attorney for Plaintiff

Defendant's Address is:

Norman J. Currier  
Fairhope, Alabama  
c/o Currier's Dairy

FILED

AUG 4 1964

Alice L. Duck, CLERK  
REGISTER

6139

SUMMONS

MID-SOUTH CHEMICAL CORPORATION,

PLAINTIFF,

- T O -

NORMAN J. CURTIER,

DEFENDANT.

Received by of Aug 1964  
and on 10th day of Aug 1964  
served by of the within Norman J. Currier

By service on

TAYLOR WILKINS, Sheriff  
BY Taylor Wilkins D. S.  
River Park

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY Deputy  
DEPUTY SHERIFF

FILED

AUG 11 1964

ALICE J. BUCK, CLERK  
RECEIVED

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

COPY

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

October 26, 1965

Hon. Telfair Mashburn  
Circuit Judge  
Bay Minette, Alabama


Re: Farmers & Merchants Bank  
Vs: J. W. Kinsey, Jr.  
V Case No. 6654

Re: Mid-South Chemical Co. ✓  
Vs: Norman Currier  
Garnishee-Barber Pure  
Milk Company Case No. 6139½

Dear Judge:

These two cases have been settled between the parties  
and Court costs paid. Kindly enter on docket sheets.

Cordially yours,

  
FOREST A. CHRISTIAN

P. S. Mrs. Duck- Enclosed is check. Please send receipts soon.

COPY

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P.O. DRAWER 180  
FOLEY, ALABAMA 36535

AREA CODE 205  
WH 3-2201

November 12, 1964

Barber Pure Milk Company  
Moffat Road  
Route 3#, Box 446X  
Mobile, Alabama

Re: Garnishment against  
Norman J. Currier  
for Mid-South Chemical  
Case No. 6139½

Gentlemen:

Received your letter dated November 3, addressed to the Clerk of Court. Since I am handling the other collection in which \$500 is being paid on a garnishment, I realize that we can not expect any payments until this has been paid which should be within the next several months.

I suggest that we pay the \$500 per month on the Baldwin Animal Clinic and then put Mid-South Chemical Corporation next in line for the \$500 per month payment, because we realize that "we can not kill the goose that lays the golden egg".

Your cooperation in this is appreciated.

Cordially yours,  
ORIGINAL SIGNED  
FOREST A. CHRISTIAN

FOREST A. CHRISTIAN

cc: Clerk of Court  
Baldwin County  
Bay Minette, Alabama

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

CASE NO. 6139

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 October, 1964 Term  
of the Circuit Court of Baldwin County, to-wit: on the 20th day of October,  
1964, MID-SOUTH CHEMICAL CORPORATION,

recovered a judgment against NORMAN J. CURRIER

~~XXXXXXXXXXXX~~

for the sum of  
THREE THOUSAND SIX HUNDRED NINETY-SEVEN & 00/100 - - - - - Dollars  
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that  
BARBER PURE MILK COMPANY, Moffat Road, Route #3, Box 446, Mobile, Alabama

supposed to be indebted to or have effects of the said NORMAN J. CURRIER

in its possession, or under its control, and that he believes process of  
Garnishment against said NORMAN J. CURRIER  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 28th  
day of October A. D. 19 64

Alice J. Duck  
Clerk.

[Signature]

586

STATE OF ALABAMA

Baldwin County

TO Norman J. Currier Defendant.....:

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

MID-SOUTH CHEMICAL CORPORATION Plaintiff.....

versus NORMAN J. CURRIER Defendant.....

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

Barber Pure Milk Company.....

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the .....28

.....day of October....., 19.....64

*Reuben J. Currier*  
Clerk of the Circuit Court.

*E-11-5-64*

588

6139 1/2

Received 28 day of Oct 1964

and on 5 day of Nov 1964

served a copy of the within Notice

on Norman S. Carrier

by service on \_\_\_\_\_

by service on \_\_\_\_\_

Taylor Wilkins

TAYLOR WILKINS, Sheriff

By Roy Randall D. S.

Sheriff claims 70 copies of

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY RR

DEPUTY SHERIFF

## NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Norman S. Carrier

Midsouth Chemical Corp

Plaintiff....

VS.

Norman S. Carrier

Defendant....

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

OCTOBER

TERM, 1964

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular October Term, 1964, of the Circuit Court of Baldwin County,  
to-wit: On the 20th day of October, 1964, being a regular day of  
said term, MID-SOUTH CHEMICAL CORPORATION

recovered judgment against NORMAN J. CURRIER

for the sum of THREE THOUSAND SIX HUNDRED NINETY-SEVEN & 00/100 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:

BARBER PURE MILK COMPANY

Moffat Road, Route #3, Box 446

Mobile, Alabama

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant NORMAN J. CURRIER 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 BARBER PURE MILK COMPANY,  
Moffat Road, Route #3, Box 446, Mobile, 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, on the within thirty days (30) 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 its answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer it was then indebted to said defendant  
NORMAN J. CURRIER and whether it will not be indebted in future to said defendant  
NORMAN J. CURRIER 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 NORMAN J. CURRIER

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

Witness, ALICE J. DUCK, Clerk of said Court, this 20th day of October, A. D., 1964

Issued 20th day of October A. D., 1964

ATTEST:

EX-10-31-64

Alice J. Duck, Clerk.



289

Received 29 Day of Oct 1964  
and on 31 Day of Oct 1964  
I served a Copy of the Garnishment  
on Barber Pure Milk Company

by service on C. W. Poole  
officer mgr

RAY D. EDGES, Sheriff

By J. M.

D. S.

Pl 2402  
Circuit Court, Baldwin County

No. 6139 1/2

MidSouth Chemical

VS. } Garnishment On Judgment

Norman J. Currier

31  
ST  
CW Poole off mgr

Issued 24 day of Oct 1964

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

RECEIVED

OCT 29 1964

SHERIFF'S OFFICE

Attorney



## BARBER PURE MILK COMPANY

MOFFAT ROAD

ROUTE 3, BOX 446X

MOBILE, ALABAMA

November 3, 1964

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

SUBJECT: Garnishment against  
Norman J. Currier  
No. 6139<sup>1</sup>/<sub>2</sub>

Dear Miss Duck:

This is in response to your summons to appear before your Court on or before November 28, 1964, concerning the subject garnishment.

Please accept this written reply in lieu of a personal appearance in which we will explain our position in this matter.

Barber Pure Milk Company of Mobile purchases milk each day from approximately 67 local dairy farms of varying sizes.

Mr. Currier operates his dairy farm under the name of Azalea Drive Dairy, Route 2, Box 40, Fairhope, Alabama, and supplies us with approximately 3% of the milk we use, which amounts to approximately 50,000 pounds per month at a rate of approximately \$6.00 CWT. From this approximate \$3,000.00 Mr. Currier has prior commitments totaling almost one half this amount.

The largest monthly assignment of \$500.00 is payable to: Forest A. Christian, P. O. Drawer 190, Foley, Alabama, in response to your Civil Cost Bill No. 5555<sup>1</sup>/<sub>2</sub> and we frankly know that an additional garnishment at this time will be too great a burden.