

THE STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WHEREAS, on the 3rd day of July, 1967,
the following order was made and judgment entered to-wit:

MARY SHAFFER,	X	
Plaintiff,	X	
vs.	X	IN THE CIRCUIT COURT OF
JAMES STEWART,	X	
Defendant,	X	BALDWIN COUNTY, ALABAMA
NEEDMORE CONSTRUCTION COMPANY,	X	
INC., A Corporation,	X	AT LAW CASE # 6197 1/2
Garnishee.	X	

Comes now the Plaintiff, by attorney, and the Garnishee having failed to file his answer as required by law and it appearing to the Court that a writ of Garnishment has been duly issued in this cause by the Clerk of this Court, and served upon said Garnishee, and that on the 30th day of September, 1965, the Plaintiff recovered a judgment against the Defendant for the sum of Five Hundred Dollars (\$500.00) besides the sum of Sixteen Dollars and Fifty Cents (\$16.50) costs of suit: It is therefore ordered by the Court that the Plaintiff recover of the Garnishee the sum of Five Hundred Dollars (\$500.00) and the sum of Sixteen Dollars and Fifty Cents (\$16.50) costs of original suit, as also the cost of this Garnishment unless within thirty days after service of the rendition of this judgment, the said Garnishee appear and show cause why this judgment should not be made final and absolute, and that a copy of this order be served upon the said garnishee as required by law.

These are therefore to command you, that you make known the premises aforesaid to the said Needmore Construction Company, Inc., A Corporation, that it be and appear within thirty days after service of the rendition of said judgment to show cause why said judgment should not be made final and absolute against it and have you then and there this writ with your endorsement thereon.

Done this 3rd day of July, 1967.

/s/ Telfair J. Mashburn
Circuit Judge

FILED

JUL 3 1967

WILLIAM W. WILKINS, CLERK

Received 3 day of July 1967
and on 12 day of July 1967
I served a copy of the within Notice
on Needman Construction
Co.
By service on SS Hollars

TAYLOR WILKINS, Sheriff

By W. A. Zolbert D.S.

7 miles north of B.R.

Sheriff claims 14 miles at

Ten Cents per mile Total \$ 1.40

TAYLOR WILKINS, Sheriff

BY W. A. Zolbert
DEPUTY SHERIFF

6197 1/2

Roy Deann

Mary Shaffer
Plt.

us.

James Stewart
Capt

serv.

Need more construction
Co. Garrison

John E. Chason
att.

THE STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WHEREAS, on the 22nd day of November, 1967,
the following order was made and judgment entered, to-wit:

MARY SHAFFER,	X	
Plaintiff,	X	
vs.	X	IN THE CIRCUIT COURT OF
JAMES STEWART,	X	
Defendant,	X	BALDWIN COUNTY, ALABAMA
DEVORE TRUCKING CO.,	X	
INC., a corporation,	X	AT LAW NO. 6197 1/2
Garnishee.	X	

Comes now the Plaintiff, by attorney, and the Garnishee having failed to file his answer as required by law and it appearing to the Court that a Writ of Garnishment has been duly issued in this cause by the Clerk of this Court, and served upon said Garnishee, and that on the 30th day of September, 1965, the Plaintiff recovered a judgment against the Defendant for the sum of Five Hundred Dollars (\$500.00) besides the sum of Sixteen Dollars and Fifty Cents (\$16.50) costs of suit: And the sum of Three Hundred Twenty-Five Dollars and Twenty-Five Cents (\$325.25) remains unpaid, it is, therefore, ORDERED by the Court that the Plaintiff recover of the Garnishee the sum of Three Hundred Twenty-Five and 25/100 Dollars (\$325.25) and the sum of Sixteen Dollars and Fifty Cents (\$16.50) cost of original suit, as also the cost of this Garnishment unless within thirty days after service of the rendition of this judgment, the said Garnishee appear and show cause why this judgment should not be made final and absolute, and that a copy of this order be served upon the said

Garnishee as required by law.

These are therefore to command you, that you make known the premises aforesaid to the said DeVore Trucking Co., Inc., a corporation, that it be and appear within thirty days after service of the rendition of said judgment to show cause why said judgment should not be made final and absolute against it and have you then and there this writ with your endorsement thereon.

Done this 22nd day of November, 1967.

Jelfair A. MacArthur
Circuit Judge

FILED

NOV 22 1967

ALICE J. DUCK CLERK
REGISTER

6197 1/2

Received 22 day of Nov. 1967
and on 24 day of Nov 1967
I served a copy of the within Dan-
Dedore Trucking Co.
by service on Arthur Brown owner

TAYLOR WILKINS, Sheriff
Harriet Chivers, S.

Loxley

Sheriff's claim 40 miles at
Ten Cents per mile Total 4.00
TAYLOR WILKINS, Sheriff
BY Carline Childers
DEPUTY SHERIFF

Mary Shaffer,
Pltf.

vs.

James Stewart,
Deft.

serve:
Dedore Trucking
Co. Inc. a Corp.
Loxley - Garnishee.

John Earle Chason
Atty.

THE STATE OF ALABAMA
Baldwin County

Circuit Court

6197 1/2

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State
aforesaid Norborne C. Stone, Jr.

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

of the Circuit Court of Baldwin County, to-wit: on the 30th day of September

1965, Mary Shaffer

recovered a judgment against James Stewart

..... for the sum of
Five Hundred and no/100 (\$500.00)* * * * * Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that there.....
remains due and unpaid the sum of \$308.75, plus interest and that DeVore
Trucking Co., Inc., is

supposed to be indebted to or have effects of the said James Stewart

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

Garnishment against said DeVore Trucking Co., Inc.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 4

day of Oct A. D. 1965

Alice J. Duck
Clerk.

FILED

OCT 4 - 1965

ALICE J. DUCK

CLERK

Mary Shaffer

LAW OFFICES OF
JOHN W. GIBSON
TROY, ALABAMA

P. O. BOX 472 488

566-1991
TELEPHONE 1405

July 14, 1967

Hon. Telfair J. Mashburn
Circuit Judge
Bay Minette, Alabama

Re: Mary Shaffer vs James Stewart
Needmore Construction Company,
Inc., a Corporation, Garnishee
Case No. 6197½

Dear Sir:

On April 25, 1967 a writ of garnishment was issued directed to Graham and Needmore Construction Company, Inc., a Corporation. There is no corporation by this name. There is a S. A. Graham Incorporated and a Needmore Construction Company Incorporated. Both being separate and distinct corporations with different stockholders and different officers.

On May 12, 1967 I forwarded a Motion to Quash the sheriff's return on the garnishee. I did not receive a copy of the order setting the motion down for hearing or any copy of the order relating to my motion. I had forwarded a copy of my motion to Hon. Norborne C. Stone.

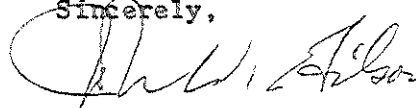
On July 3, 1967 a conditional judgment was entered by your court and this conditional judgment was served on one S. S. Sellers on July 12, 1967. The original writ of garnishment was served on one Roy Dunn. Neither Mr. Dunn nor Mr. Sellers are officers designated for service of process for Needmore Construction Company, Inc. Mr. Dunn is a Vice-President of Needmore Construction Company but Mr. Sellers is not an officer of said corporation..

Mr. Robert R. Dunn, Troy, Alabama is the officer designated for service of process. None of these papers have been served on Mr. Robert R. Dunn.

I would like for the enclosed motion and answer to be set down for a hearing, if demanded by Mr. Stone, and I would like to have notice of same.

Thanking you in advance for your kind consideration I remain

Sincerely,



John W. Gibson

JWG/vm

LAW OFFICES OF
JOHN W. GIBSON
TROY, ALABAMA

P. O. BOX 472 488

566-1991
TELEPHONE 1405

Page 2
Hon. Telfair J. Mashburn
Circuit Judge
Bay Minette, Alabama

cc: Hon. Norborne C. Stone
Attorney at Law
Bay Minette, Alabama

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

MARY SHAFFER,	X	
Plaintiff,	X	
vs.	X	IN THE CIRCUIT COURT OF
JAMES STEWART,	X	
Defendant,	X	BALDWIN COUNTY, ALABAMA
NEEDMORE CONSTRUCTION COMPANY,	X	
INC., A Corporation,	X	AT LAW CASE # 6197 1/2
Garnishee.	X	

Comes now the Plaintiff, by attorney, and the Garnishee having failed to file his answer as required by law and it appearing to the Court that a writ of Garnishment has been duly issued in this cause by the Clerk of this Court, and served upon said Garnishee, and that on the 30th day of September, 1965, the Plaintiff recovered a judgment against the Defendant for the sum of Five Hundred Dollars (\$500.00) besides the sum of Sixteen Dollars and Fifty Cents (\$16.50) costs of suit: It is therefore ordered by the Court that the Plaintiff recover of the Garnishee the sum of Five Hundred Dollars (\$500.00) and the sum of Sixteen Dollars and Fifty Cents (\$16.50) costs of original suit, as also the cost of this Garnishment unless within thirty days after service of the rendition of this judgment, the said Garnishee appear and show cause why this judgment should not be made final and absolute, and that a copy of this order be served upon the said Garnishee as required by law.

These are therefore to command you, that you make known the premises aforesaid to the said Needmore Construction Company, Inc., A Corporation, that it be and appear within thirty days after service of the rendition of said judgment to show cause why said judgment should not be made final and absolute against it and have you then and there this writ with your endorsement thereon.

Done this 3rd day of July, 1967.

Jeffrey J. Madaleno
Circuit Judge

FILED
JUL 8 1967

ALICE J. DUCK, CLERK
REGISTER

THE STATE OF ALABAMA
Baldwin County

Circuit Court

6197 1/2

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State
aforesaid Norborne C. Stone, Jr.

who being duly sworn, on oath says, that a regular Term
of the Circuit Court of Baldwin County, to-wit: on the 30th day of September

1965..... Mary Shaffer.....

recovered a judgment against James Stewart.....

..... for the sum of

Five Hundred and no/100 (\$500.00)..... Dollars

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

remains due and unpaid the sum of \$308.75, plus interest and that Graham &

Needmore Construction Company, Inc., a Corporation, is

supposed to be indebted to or have effects of the said James Stewart

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

Garnishment against said Graham & Needmore Construction Co., Inc., a corporation,

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 25th

day of April A. D. 1967

John Earl Chason
Notary Public State of Large

FILED
APR 25 1967
ALICE J. DUCK
CLERK
REGISTER

Norborne C. Stone, Jr.

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 30th day of September, 1965, being a regular day of said term, Mary Shaffer

recovered judgment against James Stewart

for the sum of \$500.00 Dollars, and cost of suit, and affidavit having been made by Norborne C. Stone, Jr. that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Graham & Needmore Construction Company, Inc., a corporation,

has or is believed to have in its possession, or under it's control money or effects belonging to said defendant James Stewart 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 Graham & Needmore Construction Company, Inc., a corporation,

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.....Monday in A. D. 1967, 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 of it's answer, or at any time intervening the time of serving the garnishment, and making the answer it was or is indebted to said defendant James Stewart and whether it will not be indebted in future to said defendant James Stewart by a contract then existing, and whether by a contract then existing it 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 it's possession or under it's control money or effects belonging to the defendant James Stewart

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

Witness, ALICE J. DUCK, Clerk of said Court, this 25th day of April, A. D., 1967.

Issuedday ofA. D., 19.....

ATTEST:

773 Alice J. Duck, Clerk.

MARY SHAFFER

PLAINTIFF

VS.

JAMES STEWART

DEFENDANT

IN THE CIRCUIT COURT

OF BALDWIN COUNTY

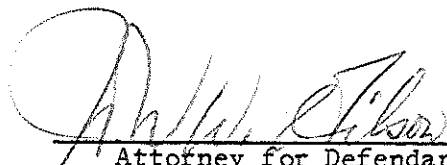
ALABAMA

CASE NO. 6197 $\frac{1}{2}$

NEEDMORE CONSTRUCTION CO., INC.
a Corporation garnishee

MOTION TO QUASH RETURN

Now comes Needmore Construction Co., Inc., a Corporation and appears specially for the purpose, and for that purpose alone, and removes the court to quash the service of the garnishment on judgement, herein, and for grounds thereof says that its true corporate name is "Needmore Construction Co., Inc., a Corporation", and its name is not Graham and Needmore Construction Co., Inc., a Corporation, and further that there is in existence a corporation by the name of S. A. Graham, Inc., a Corporation, all of which is hereby ratified.


Attorney for Defendant

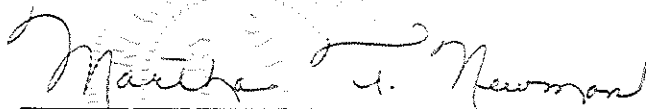
STATE OF ALABAMA

PIKE COUNTY

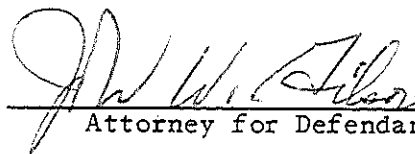
Personally appeared before me the undersigned authority, of the said County, in said State, Robert R. Dunn, who, being by me first sworn, on oath deposes and says that he is President of Needmore Construction Co, Inc. A Corporation, has knowledge of the facts herein contained, and is authorized to make this affidavit, and that the same is true.


Robert R. Dunn

Sworn to and subscribed before me on this 12th day of May, 1967.


Notary Public

Copy of the foregoing mailed to Hon. Norborne C. Stone,
Attorney at Law, Bay Minette, Alabama on this the 12th day of
May, 1967, postage prepaid.


Attorney for Defendant

FILED
MAY 15 1967
ALICE L. DICKSON, CLERK
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA

MARY SHAFFER,

PLAINTIFF

VS.

JAMES STEWART,

DEFENDANT

NEEDMORE CONSTRUCTION CO., INC.

A CORPORATION GARNISHEE

*

*

*

*

*

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*

IN THE CIRCUIT COURT

OF BALDWIN COUNTY

ALABAMA

CASE NO. 6197½

MOTION AND ANSWER OF GARNISHEE

Comes now Needmore Construction Co., Inc., a Corporation, by and through its president, Robert R. Dunn, and moves the Court to set aside the judgment nisi heretofore rendered and as grounds therefore says:

1. That the garnishment writ was issued on, to-wit: the 25th day of April, 1967, by the Clerk of this Court.
2. That a copy was served upon an employee of Needmore Construction Co., Inc., a corporation, who was not qualified to accept service of legal papers.
3. That the writ of garnishment was directed to "Graham and Needmore Construction Company, Inc., a Corporation."
4. That on the 12th day of May, 1967, a motion to quash the service of the writ of garnishment was mailed to the Clerk of this Court, executed by Needmore Construction Co., Inc., a Corporation, acting by and through its preident, Robert R. Dunn, setting out its true name.
5. That on the 3rd day of July, 1967, a conditional judgment was rendered against Needmore Construction Co., Inc., a Corporation, and was served on S. S. Sellers, on the 12th day of July, 1967, by the sheriff of Baldwin County, Alabama.
6. That S. S. Sellers is not an officer of this Corporation and is not the agent designated for service of process.
7. That Robert R. Dunn is the only person designated for service of process on this corporation.
8. That this corporation has a defense to this writ of garnishment and the conditional judgment.
9. That on the date of the service of the writ of garnishment, and on the date of filing the motion to quash the sheriff's return, and

on this date, this corporation was not and is not indebted to the defendant; that it will not be indebted to defendant in the future by contract now existing; is not liable to defendant 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; has not, in its possession or under its control, money or effects belonging to said defendant; that the foregoing applies for the intervening time from the purported service of the writ of garnishment to the present time.

10. That the copy of the writ purportedly served on this corporation shows that same was not issued, by not having a date for the issuance of same.

John W. Eiler
Attorney for Garnishee

STATE OF ALABAMA

PIKE COUNTY

Personally appeared before me the undersigned authority, of the said County, in said State, Robert R. Dunn, who, being by me first sworn, on oath deposes and says that he is President of Needmore Construction Co., Inc., A Corporation, has knowledge of the facts herein contained, and is authorized to make this affidavit, and that the same is true.

Robert R. Dunn

Sworn to and subscribed before me on this 14th day of

July, 19 67.

Martha T. Newman
Notary Public

Copy of the foregoing mailed to Hon. Norborne C. Stone, Attorney at Law, Bay Minette, Alabama on this the 14th day of July, 1967, postage prepaid.

John W. Eiler
Attorney for Garnishee

FILED
JUL 17 1967

ALICE L. DICK, CLERK
REGISTERED

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 30th day of September, 1965, being a regular day of said term, Mary Shaffer

recovered judgment against James Stewart

for the sum of \$500.00 Dollars, and cost of suit,

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

DeVore Trucking Co., Inc.

has or is believed to have in its possession, or under its control money or effects belonging to said defendant James Stewart 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 DeVore Trucking Co., Inc.,

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 30 days from service hereof. on the Monday in A. D. 1967

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 of its answer, or at any time intervening the time of serving the garnishment, and making the answer it was or is indebted to said defendant

James Stewart and whether it will not be indebted in future to said defendant James Stewart by a contract then existing, and whether by a contract then existing it

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 James Stewart

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

Witness, ALICE J. DUCK, Clerk of said Court, this 4th day of Oct A. D., 1967

Issued 4th day of Oct A. D., 1967

ATTEST

784

Alice J. Duck, Clerk.

Served 4 day of Oct. 1967

on 1 day of Oct. 1967

served a copy of the within I am.

to De Vore Trucking Co.

by service on Betty Davis

my

TAYLOR WILKINS, Sheriff

By Carlie Children

Deputy

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Carlie Children

DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 6197 1/2

Mary Shayer

VS. } GARNISHMENT ON JUDGMENT

James Stewart

De Vore Trucking Co.

Issued 4 day of Oct 1967

Returnable _____ day of _____ 19____

John Carl Chase

Attorney

STATE OF ALABAMA

Baldwin County

TOJames Stewart....., Defendant.....:

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

.....Mary Shaffer....., Plaintiff.....,

versusJames Stewart....., Defendant.....,

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

.....Trucking Co., Inc.....

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the *4th*.....day of *Oct.*, 19*67**Alice J. Duck*
.....
Clerk of the Circuit Court.

Received 4 day of Oct. 1967
and on 11 day of Oct 1967

served a copy of the within Notice

James Stewart

By service on

TAYLOR WILKINS, Sheriff

By Herbale Chason D.

day by

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY

Carlisle Ch

DEPUTY SHERIFF

6197 1/2

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

James Stewart

Mary Shaffer

Plaintiff....

VS.

James Stewart

Defendant....

John Earle Chason

STATE OF ALABAMA

Baldwin County

TO James Stewart....., Defendant.....:

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

Mary Shaffer....., Plaintiff.....,versus James Stewart....., Defendant.....,now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which Needmore.....Construction Company, Inc., a corporation,.....

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

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

17 day of May....., 1947.Cliff A. Black
Clerk of the Circuit Court.

No. 6197 1/2

Received 18 day of May 1967

and on 19 day of May 67

I served a copy of the within Notice
on James Stewart

By service on

TAYLOR WILKINS, Sheriff

By W A Zelber

672

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Mary Shaffer
Plaintiff....

VS.

James Stewart

Defendant....

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 ...30th.....day of.....September....., 1965....., being a regular day of said term,Mary Shaffer.....

recovered judgment againstJames Stewart.....

for the sum of\$500.00..... Dollars, and cost of suit,

and affidavit having been made byNorborne C. Stone, Jr.....

that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Needmore Construction Company, Inc., a corporation,

has or is believed to have inits..... possession, or underits..... control money

or effects belonging to said defendant James Stewart..... 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 SummonNeedmore Construction

Company, Inc., a corporation,

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.....Monday in A. D. 1967.....

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 of its answer, or at any time intervening the time of

serving the garnishment, and making the answer.....it..... was ...or...is.... indebted to said defendant

James Stewart.. and whetherit..... will not be indebted in future to said defendant

James Stewart by a contract then existing, and whether by a contract then existingit.....

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 prop-

erty, and whetherit..... has not inits..... possession or underits.....

control money or effects belonging to the defendant..... James Stewart.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....17..... day of.....May..... A. D., 1967

Issued17..... day of.....May..... A. D., 1967.

ATTEST:

1963 Alice J. Duck, Clerk.

received 18 day of May 1967

and on 19 day of May 1967

served a copy of the within Staw.

in Needmore Court. 6.

By service on Roy Dunn

TAYLOR WILKINS, Sheriff

By W A Solbert

7 miles north of
B. 12

Sheriff claims 14 miles at

Ten Cents per mile Total \$ 1.40

TAYLOR WILKINS, Sheriff

BY W A Solbert
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 6199 1/2

Mary Shaffer

VS.

} GARNISHMENT ON JUDGMENT

James Stewart

Needmore Construction
Garnishee

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Attorney

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 30th day of September, 1965, being a regular day of said term, Mary Shaffer

recovered judgment against James Stewart

for the sum of \$500.00 Dollars, and cost of suit, and affidavit having been made by Norborne C. Stone, Jr. that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Graham & Needmore Construction Company, Inc., a corporation,

has or is believed to have in its possession, or under it's control money or effects belonging to said defendant James Stewart 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 Graham & Needmore Construction Company, Inc., a corporation,

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.....Monday in A. D. 1967, 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 of it's answer, or at any time intervening the time of serving the garnishment, and making the answer.....it was OR IS indebted to said defendant James Stewart and whether it will not be indebted in future to said defendant James Stewart by a contract then existing, and whether by a contract then existingit 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 it's possession or under it's control money or effects belonging to the defendant.....James Stewart

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

Witness, ALICE J. DUCK, Clerk of said Court, this 25th day of April, A. D., 1967.

Issuedday ofA. D., 19.....

ATTEST:

782 Alice J. Duck, Clerk.

RECEIVED

APR 26 1967

TAYLOR WILKINS
SHERIFF

Received 26 day of April 1967
and on 1 day of May 1967
I served a copy of the within Garn.
on Graham & Needmore
Const. Co.
By service on Roy Dunn

TAYLOR WILKINS, Sheriff
By W. A. Solbert S.
10 miles north of Bay

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. A. Solbert
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 6197 1/2

MARY SHAFFER

VS.

GARNISHMENT ON JUDGMENT

JAMES STEWART

Graham & Needmore Construction
Co., Inc., a Corp., Garnishee

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Chason, Stone & Chason

Attorney

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

TO James Stewart, Defendant.....:

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

Mary Shaffer, Plaintiff.....,versus James Stewart, Defendant.....,now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which Graham &Needmore Construction Co., Inc., a Corporation

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

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

25th day of April, 1967Alice J. Luck
Clerk of the Circuit Court.

778

RECEIVED

APR 26 1967

TAYLOR WILKINS
SHERIFF

Received 26 day of April 1967
and on 1 day of May 1967
served a copy of the within Notice
on James Stewart
By service on _____

TAYLOR WILKINS, Sheriff

By W A Talbert D. S.
om

6197 1/2

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

JAMES STEWART

MARY SHAFFER

Plaintiff....

VS.

JAMES STEWART

Defendant....

Chason, Stone & Chason, Atty

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 Norborne C. Stone, Jr.
who being duly sworn, on oath says, that a regular Term
of the Circuit Court of Baldwin County, to-wit: on the 30th day of September
1965, Mary Shaffer
recovered a judgment against James Stewart
..... for the sum of
Five Hundred and no/100 (\$500.00) Dollars
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that there
remains due and unpaid the sum of \$308.75, plus interest and that Needmore
Construction Company, Inc., a corporation, is
supposed to be indebted to or have effects of the said James Stewart
in its possession, or under its Control, and that he believes process of
Garnishment against said Needmore Construction Company, Inc., a corporation,
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 17th
day of May A. D. 1967
John Earle Chason
Clerk

Norborne C. Stone, Jr.

NO. 6197 1/2

Circuit Court

vs.

AFFIDAVIT
GARNISHMENT ON JUDGMENT

Filed this 17 day of

May, 1967.

Wesley J. Hester
Clerk.