

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JAMES ENGLISH BRYANT, 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, Law Side, by ED McNEIL, plaintiff, against JAMES ENGLISH BRYANT, as the defendant.

WITNESS my hand this 3rd day of September, 1965.

Alice J. Luck  
Clerk.

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ED McNEIL,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
JAMES ENGLISH BRYANT,	)	
Defendant.	)	LAW SIDE.

6675

The Plaintiff claims of the Defendant, the sum of THREE HUNDRED FIFTY AND NO/100 DOLLARS (\$350.00), as damages for that heretofore on, to-wit, the 6th day of February, 1965, at approximately 2:15 A. M., on U. S. Highway 31 North, in the town of Perdido, Alabama, approximately 18 feet North of Southern Bell Telephone & Telegraph Pole Number 2, which is a public highway in Baldwin County, Alabama, the Defendant so negligently operated an automobile which he was then and there driving, as to cause, permit or allow said automobile to run into, upon or against Plaintiff's automobile and as a proximate result of the negligence of the Defendant as aforesaid, Plaintiff's said automobile was damaged in this: the left front fender was bent, broken and damaged; the front grille was bent, broken and damaged, the paint on the front and left side

of the automobile was damaged and he was put to the expense for towing his automobile to a garage; all to the damage of the Plaintiff in the amount of \$350.00 as aforesaid, hence this suit.

J. Connor Owens, Jr.  
J. Connor Owens, Jr.,  
Attorney for Plaintiff.

FILED

SEP 8 1965

ALICE L. DICK, CLERK  
REGISTER

EX-10-12-65

Case No - 6675

SUMMONS AND COMPLAINT

ED McNEIL,

Plaintiff,

vs.

JAMES ENGLISH BRYANT,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

FILED

SEP 2 1965

ALICE I. DUCK, CLERK  
REGISTER

J. Connor Owens, Jr.

3 day of Sept 1965  
12 day of Oct 1965  
copy of the within  
James English Bryant

By service on

TAYLOR WILKINS, Sheriff

By

W. A. Fallick  
om

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 28 day of November, 1966, being a regular day of said term, Ed McNeil

recovered judgment against James English Bryant

for the sum of THREE HUNDRED FIFTY AND NO/100 Dollars, and cost of suit, and affidavit having been made by Walter S. Patton that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

BALL-CO CONTRACTORS, INC., a corporation

BAY MINETTE, 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 .....

BALL-CO CONTRACTORS, INC., a corporation

BAY MINETTE, 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 from service hereof, ~~on the XXXXX Monday XXXXX~~ 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 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 English Bryant

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

Witness, ALICE J. DUCK, Clerk of said Court, this 17th day of October, A. D., 1966...

Issued 18th day of October, A. D., 1966...

ATTEST:

Alice J. Duck, Clerk.

CIRCUIT COURT, BALDWIN COUNTY

No. 6675 1/2

Received 18 day of Oct. 1966  
on 19 day of Oct 1966  
served a copy of the within Garn.  
on Ball - Co

by Fowell Hanelawn

TAYLOR WILKINS, Sheriff

By W A Talbot  
om

Ed McNeil  
VS. } GARNISHMENT ON JUDGMENT

James English Bryant

Issued 18 day of Oct 1966

Returnable Oct day of Oct 1966

Whiter S. Patton

Attorney

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

#6675 1/2

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State  
aforesaid ..... Walter S. Patton .....

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

of the Circuit Court of Baldwin County, to-wit: on the <sup>18th</sup> ~~26th~~ day of November

1965, ..... Ed McNeil .....

recovered a judgment against ..... James English Bryant .....

..... for the sum of

Three Hundred Fifty and no/100 ..... Dollars

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

Ball- Co Contractors Inc., a Corporation .....

supposed to be indebted to or have effects of the said ..... James English Bryant

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

Garnishment against said ..... Ball Co Contractors, Inc., a Corp.,  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this ..... 18th

day of ..... October ..... A. D. 19.66

*Alice J. Duck*

Clerk.

*Walter S Patton*

STATE OF ALABAMA

Baldwin County

TO JAMES ENGLISH BRYANT  
....., Defendant.....:

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

ED McNEIL  
....., Plaintiff.....,versus JAMES ENGLISH BRYANT  
....., Defendant.....,

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

BALL-CO CONTRACTORS, INC., a corporation, Bay Minette, Alabama, .....

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

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

18 day of October....., 1966.

  
.....  
Clerk of the Circuit Court.

Received 18 day of Oct. 1966  
and on 19 day of Oct 1966  
I served a copy of the within Notice  
on James English Bryant  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By W. A. Talbot  
an

6675 1/2

**NOTICE**

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

James English Bryant

Ed. McNeil

Plaintiff.....

VS.

James English Bryant

Defendant.....

Walter J. Patton



ED McNEIL

PLAINTIFF

VS

JAMES W. ENGLISH BRYANT

DEFENDANT

BAL-CO CONTRACTORS, INC.

GARNISHEE

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 6675<sup>1</sup>/<sub>2</sub>

ANSWER OF GARNISHEE

Comes now Garnishee in the above styled cause and for answer to the garnishment filed herein says:

1. Defendant is employed by Garnishee earning indefinite wages, payable in weekly or monthly periods.

2. Garnishee is now withholding Defendant's wages at the rate of \$25.00 per month until the judgment sum noted in the garnishment is accumulated, and will remit the full sum upon collection.

3. Garnishee has reached this agreement between Garnishee's attorney and Plaintiff's attorney.

BAL-CO CONTRACTORS, INC.

BY: Louise Hamilton

Sworn to and subscribed before me this 17 day of

November, 1966.

W. B. Bay  
Notary Public

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 17 day of November  
1966 served a copy of the foregoing pleading on counsel for BAL-CO  
parties to this proceeding by mailing the same by United States  
Mail, properly addressed, with first-class postage prepaid.

W. B. Bay

**FILED**

NOV 7 1966

ALICE J. DUCK, CLERK  
REGISTER