

STATE OF ALABAMA )  
COUNTY OF BALDWIN )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon M. I. FOREMAN and MARY ELBA FOREMAN, to appear and answer, plead or demur, within thirty days from the date hereof of this service, to a Bill of Complaint filed against them in the Circuit Court, at Law, for said County and said State by Ernest M. Bailey.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this the 27<sup>th</sup> day of Oct, 1965.

Defendants may be served  
at Mobile Avenue, Fairhope,  
Alabama.

Alice J. Duck  
Clerk of Court

ERNEST M. BAILEY,

Plaintiff

Vs

M. I. FOREMAN and MARY ELBA  
FOREMAN

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

6726

COUNT ONE:

Plaintiff claims of Defendants the sum of TWO THOUSAND THREE HUNDRED DOLLARS (\$2,300.00), due by promissory note made by them on, heretofore, to-wit: The 27th day of October, 1958, which sum of money, with interest thereon, is due and unpaid; and Plaintiff avers that in and by the terms of said note, the Defendants waived all rights of exemption under the laws of the State of Alabama, and Plaintiff claims the benefit of said waiver; Plaintiff claims the additional sum of \$250.00 as a reasonable sum as attorney fees for bringing this suit for that the Defendants in and by the terms of said note agreed to pay a reasonable attorney fee, and Plaintiff avers that said amount is a reasonable attorney fee for the bringing and prosecuting of this suit.

FILED

OCT 8 1965

ALICE J. DUCK, CLERK  
REGISTER

Ernest M. Bailey  
Attorney for Plaintiff

received 8 day of Oct. 1965  
on 10 day of Oct. 1965  
served a copy of the within A & C

M. I. Foreman &  
Mary Elba Foreman

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

Taylor Wilkins

TAYLOR WILKINS, Sheriff

By

Roy Randall

J. Hope

Sherriff claims 140

Total due per file Total 14.00

BY Roy Randall  
DEPUTY SHERIFF

6726

ERNEST M. BAILEY,

Plaintiff

vs

M. I. FOREMAN and MARY ELBA  
FOREMAN,

Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA  
AT LAW

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

MARCH

TERM, 1969

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular JANUARY Term, 1966, of the Circuit Court of Baldwin County,  
to-wit: On the 18TH day of JANUARY, 1966, being a regular day of  
said term, ERNEST M. BAILEY

recovered judgment against M. I. FOREMAN

for the sum of THREE THOUSAND SIX HUNDRED (\$3,600) Dollars, and cost of suit,  
and affidavit having been made by ERNEST M. BAILEY  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

ENCYCLOPAEDIA BRITANNICA, INC.

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

ENCYCLOPAEDIA BRITANNICA, INC., ONE OFFICE PARK BLDG., MOBILE,  
ALABAMA,

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House  
WITHIN THIRTY (30) DAYS  
thereof, in the city of Bay Minette, 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 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 M. I. FOREMAN

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

Witness, ALICE J. DUCK, Clerk of said Court, this 21 day of MARCH, A.D., 1969

Issued MARCH A.D., 1969

ATTEST:

Alice J. Duck, Clerk.

RECEIVED

MAR 21 1969

REC'D SHERIFF DEPT.  
MOBILE COUNTY ALA.  
MAR 21 1969

24 Mar 69  
and on 28 Mar 69

I have a Copy of the within  
Encyclopedia Britannica

By Mr. Ernest M. Bailey  
May D. Bridges, Sheriff

Dr. M. E. Jones

*Ray Jones*  
6207  
Circuit Court, Baldwin County

No. 6726 1/2

ERNEST M. BAILEY

VS. } Garnishment On Judgment

M. I. FOREMAN

Issued **FILED** day of 19

Returnable MAR 21 1969 day of CLERK 19  
REGISTER

*Ernest M. Bailey*  
*Ray Jones*

ERNEST M. BAILEY  
Attorney

State of Alabama

BALDWIN COUNTY

TO M. I. FOREMAN

Defendant.....

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

ERNEST M. BAILEY

Plaintiff.....

versus M. I. FOREMAN

Defendant.....

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

ENCYCLOPAEDIA BRITANNICA

has<sup>S</sup> been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the.....2 /.....

day of MARCH, 194<sup>69</sup>.....

Clerk of the Circuit Court.

24:4-8-69

Received 21 day of March 1969  
and on 8 day of April 1969  
I served a copy of the within Notice  
on M. I. Foreman  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Roy Randall D. S.

F. Type

7117 67261n  
**NOTICE**  
**TO DEFENDANT OF GARNISHMENT**

**BY**  
**CLERK OF CIRCUIT COURT**  
**BALDWIN COUNTY, ALABAMA**

**TO**  
**ERNEST M. BAILEY**

Plaintiff.....

VS.

M. I. FOREMAN

559 N. Mobile Ave,  
Enterprise

Defendant.....

E. Bailey

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.  
MAR 21 1969

RECEIVED

MAR 21 1969

24 Day of Mar 69  
and on 28 Day of Mar 1969

BY I served a Copy of the within Return  
Encyclopedia Britannica

Ernest M. Bailey

KAY D. BRIDGES, BUREAU

Ernest M. Bailey

*Ernest Bailey*  
6207  
Circuit Court, Baldwin County

No. 6726 1/2

ERNEST M. BAILEY

VS. } Garnishment On Judgment

M. I. FOREMAN

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

MAR 21 1969

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

REGISTER

*Ernest M. Bailey*

ERNEST M. BAILEY

Attorney

THE STATE OF ALABAMA,  
BALDWIN COUNTY

6724 1/2

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid, ERNEST M. BAILEY

who being duly sworn, on oath says, that a regular JANUARY Term  
of the Circuit Court of Baldwin County, to-wit: on the 18TH day of JANUARY

1966, ERNEST M. BAILEY

recovered a judgment against M. I. FOREMAN

for the sum of THREETHOUSAND SIX HUNDRED (\$3,600.00)

Dollars  
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that  
ENCYCLOPAEDIA BRITANNICA, INC.

supposed to be indebted to or have effects of the said M. I. FOREMAN

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

Garnishment against said ENCYCLOPAEDIA BRITANNICA, INC.

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 21

day of MARCH A. D. 1969

Alice J. Duck  
Clerk.

Ernest M. Bailey



NO. 6726 1/2

## CIRCUIT COURT

ERNEST M. BAILEY

vs.

M. I. FOREMAN

### AFFIDAVIT Garnishment on Judgment

Filed this 21 day of  
MARCH, 1969

Benjamin Duck  
Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.