

RATCLIFF'S FIRESTONE, INC.,  
a corporation,

PLAINTIFF,

VS.

H. R. WILLIAMS,

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER: 6743

TO THE HONORABLE TELFAIR J. MASHBURN, JUDGE OF SAID COURT:

I, H. R. Williams, a resident of Baldwin County, Alabama, do hereby make and sign this my statement in writing under oath listing all of my assets and encumbrances in accordance with the Code of Alabama 1940, Title 7, Section 903, as follows:

Money: \$50.00

Chose in action: None

Notes: None

Bonds: None

Accounts: None

Property: Purchasing a home owned jointly with wife,  
at 1603 McMillan Street, Bay Minette, Alabama, having obligated  
to pay to-wit, \$14,000.00 with Liberty National Insurance Company  
holding a mortgage on same in the amount of to-wit, \$9,958.64.

Property: Approximately two (2) acres of land, owned jointly with wife, located at 211 Dobson Street, Bay Minette, Alabama, of an approximate value of \$2,500.00 with mortgage thereon held by the Baldwin County Bank, Bay Minette, Alabama.

Property: One 1965 Two Door Oldsmobile having paid some \$4,200.00 for same with a balance due in the amount of \$2,300.00 financed with the Baldwin County Bank, Bay Minette, Alabama, who holds a note and mortgage on said automobile.

Property: One inboard and out board off shore fishing rig purchased at a cost of some \$4,500.00 in 1962 with a balance due of \$1,100.00 with the Baldwin County Bank of Bay Minette, Alabama, holding a mortgage on same. It is doubtful that this property could be sold for the amount due on same.

Household furniture and furnishings in the home of the parties owned by wife which is mortgaged to the Baldwin County Bank, Bay Minette, Alabama.

The said H. R. Williams is employed by Empire Life Insurance Company of America, 712 Commerce Street, Dallas, Texas, and earns a draw of \$200.00 per week and at the present time does not make any more than his draw. However, he has drawn to-wit, \$1,000.00 in advance which amount he is indebted to the said company at this time, which amount was advanced to him during the Christmas Holidays during the slump season.

There are no other liens, mortgages or encumbrances on said property other than judgment obtained by Ratcliff's Firestone, Inc., a corporation.

H. R. Williams  
H. R. WILLIAMS

Sworn to and subscribed before me, a Notary Public, this 18th day of January, 1967.

Miriam L. Gilliken  
NOTARY PUBLIC

My Commission Expires May 13, 1967

I hereby certify that a copy of the foregoing was mailed to C. LeNoir Thompson, Attorney at Law, Bay Minette, Alabama, attorney for Ratcliff's Firestone, Inc., a corporation, at his address, Bay Minette, Alabama, postage duly prepaid this the 18th day of January, 1967.

Hugh Rozelle  
HUGH ROZELLE, Jr.  
Attorney for Defendant.

FILED

JAN 19 1967

ALICE J. DICK, CLERK

NOTICE TO DEFENDANT

RATCLIFF'S FIRESTONE, INC.,  
a corporation

Plaintiff

VS

H. R. WILLIAMS

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6743

TO: H. R. WILLIAMS:

Take notice that upon the written request of C. LeNoir Thompson, attorney for the plaintiff, filed in this court in this cause, you are commanded to file in this court within thirty days from the service of this notice a statement in writing, under oath, of all your assets, including money, choses in action, notes, bonds and accounts, and all other property, real, personal or mixed or any interest therein, including wages due or payable, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

Dated this 12 day of December 1966.

Alice J. Duck  
Clerk of the Circuit Court, Baldwin County,  
Alabama

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

~~YOU ARE HEREBY COMMANDED~~ to serve a copy of the above notice upon H. R. WILLIAMS and make due return thereon, according to law.

Witness my hand this the 12 day of December 1966.

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

6743

Ratcliff's Firestone  
Inc. - a corp.  
Plt.

vs-

H. R. Williams,  
Deft.

Notice to Deft.  
Write for Discovery

C. L. Thompson

Received 13 day of Dec. 1966  
and on 21 day of Dec. 1966  
I served a copy of the within Notice  
on H. R. Williams

By service on

TAYLOR WILKINS, Sheriff

By W. C. Gilbert

WRIT OF DISCOVERY

RATCLIFF'S FIRESTONE, INC., \*  
a corporation

Plaintiff

vs

H. R. WILLIAMS

Defendant

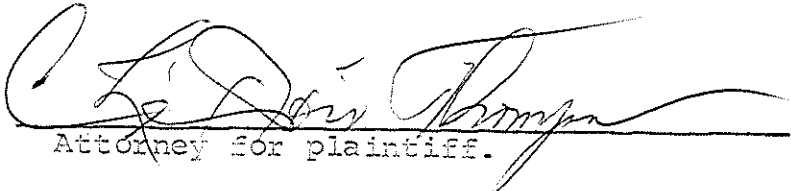
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6243

The plaintiff herein having recovered on the 1st day of Dec., 1965, a judgment against the defendant in the above styled cause for the sum of \$ 531.36 and costs in the sum of \$ \_\_\_\_\_ and such execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "no property found", the plaintiff now requests in writing that the Clerk of this Court will issue a notice to the above named defendant requiring him, within thirty days from the service of such notice, to file in this cause, a statement in writing, under oath, of all of his sources of income, name and address of his employer and assets of every kind, character and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

  
Attorney for plaintiff.

FILED  
DEC 12 1966  
ALICE J. DUCK, CLERK  
REGISTER

WRIT OF DISCOVERY

RATCLIFF'S FIRESTONE, INC., \*

a corporation

Plaintiff \*

vs \*

H. R. WILLIAMS \*


Defendant \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

The plaintiff herein having recovered on the 1st day of Dec, 1965, a judgment against the defendant in the above styled cause for the sum of \$ 531.36 and costs in the sum of \$ \_\_\_\_\_ and such execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "no property found", the plaintiff now requests in writing that the Clerk of this Court will issue a notice to the above named defendant requiring him, within thirty days from the service of such notice, to file in this cause, a statement in writing, under oath, of all of his sources of income, name and address of his employer and assets of every kind, character and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

  
Attorney for plaintiff.

FILED  
DEC 12 1966  
ALICE L. DICK, CLERK  
REGISTER

RATCLIFF'S FIRESTONE, INC.,  
a corporation

Plaintiff

vs

HEGGARD R. WILLIAMS

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6243

-1-


The plaintiff claims of the defendant a balance due of Four Hundred Sixty-two and 85/100 (\$462.85) Dollars due by promissory note made by him on December 23, 1963, and payable \$28.00 a month beginning January 15, 1964.

-2-

Plaintiff claims of the defendant Four Hundred Sixty-two and 85/100 (\$462.85) Dollars due by promissory note in the original amount of \$658.85 made by the defendant on December 23, 1963, and payable \$28.00 on the 15th day of January, 1964, and \$28.00 on the 15th day of each succeeding month until said sum has been paid, of which there is a balance due of \$462.85 with interest thereon.

-3-

Plaintiff claims of the defendant a reasonable attorney fee in accordance with the provisions of said promissory waive note.

  
Attorney for plaintiff.

FILED

OCT 27 1965

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 6743

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Heggard R. Williams

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.....

Heggard R. Williams....., Defendant.....

by Ratcliff's Firestone, Inc., a corporation.....

....., Plaintiff.....

Witness my hand this 17 day of Oct 1965

Ex-11-1-65 Alice J. Weck Clerk



No. 6743

Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Ratcliff's Firestone, Inc.,

a corporation

Plaintiffs

vs.

Heggard R. Williams

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

..... Clerk

**FILED**  
OCT 27 1965  
ALICE J. DICK, CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
1603 McMillan Avenue  
Bay Minette, Alabama

**RECEIVED**  
Received in Office

OCT 27 1965 ..... 19.....

TAYLOR WILKINS ..... Sheriff  
SHERIFF

I have executed this summons

this Nov - 1 ..... 1965

by leaving a copy with

Heggard R Williams

Taylor Wilkins Sheriff

W. O. Colbert Deputy Sheriff

#6743 1/2

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 C. Lenoir Thompson

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

of the Circuit Court of Baldwin County, to-wit: on the ..... day of .....

19..... Ratcliff's Firestone, Inc., a corporation

recovered a judgment against Heggard R. Williams

..... for the sum of

Five Hundred Thirty-one and 36/100----- Dollars

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

Empire Life Insurance Company of America, Birmingham, Alabama

supposed to be indebted to or have effects of the said Heggard R. Williams

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

Garnishment against said Heggard R. Williams

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 3rd.....

day of February..... A. D. 1967

Alice J. Duck  
Clerk.

C. Lenoir Thompson  
CLERK  
REGISTER

FILED  
FEB 8 1967

STATE OF ALABAMA

Baldwin County

TO Heggard R. Williams....., Defendant.....:

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

Ratcliff's Firestone, Inc., a corporation..... Plaintiff.....versus Heggard R. Williams....., Defendant.....,

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

Empire Life Insurance Company of America, Birmingham, Alabama.....

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 2nd.....day of February 1967.....Alice J. Luck.....  
Clerk of the Circuit Court.

Served 3 day of Feb. 1967  
and on 13 day of Feb. 1967  
I served a copy of the within Notice  
on Heggard R. Williams

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

TAYLOR WILKINS, Sheriff

By W. B. Talbert D.

on

6 24 3 1/2

# NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Heggard R. Williams

Ratchiff's Limestone  
Inc. a corp

Plaintiff....

VS.

Heggard R. Williams

Defendant....

C. Lencia Thompson

STATE OF ALABAMA

DEPARTMENT OF INSURANCE

I, the undersigned as Superintendent of Insurance for the State of Alabama, hereby certify that on the 6th day of February, 1967, I sent by registered mail in an envelope as follows:

Empire Life Insurance Company of America  
1212 Bank for Savings Building  
Birmingham, Alabama 35203

REGISTERED MAIL  
RETURN RECEIPT REQUESTED

bearing sufficient prepaid postage, a copy of a summons and complaint served upon me by the Sheriff of Montgomery County, Alabama, in a cause styled as follows:

Ratcliff's Firestone, Inc., a corporation, Plaintiff

in the Circuit Court of Baldwin County

VERSUS

Heggard R. Williams, Defendant and

(Name of Court)

Empire Life Insurance Company of America, ~~Defendant~~ Garnishee

And that on the 10th day of February, 1967, I received the return card showing receipt by the designated addressee of said envelope on the 9th day of February, 1967.

Witness my hand and official seal this the 13th day of February, 1967.

  
SUPERINTENDENT OF INSURANCE

WRIT OF DISCOVERY

RATCLIFF'S FIRESTONE, INC.,  
a corporation

Plaintiff

VS

H. R. WILLIAMS

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

The plaintiff herein having recovered on the 1st day  
of December, 1965, a judgment against the defendant in  
the above styled cause for the sum of \$531.36 and costs in  
the sum of \$ \_\_\_\_\_ and such execution having been returned  
endorsed by the Sheriff of Baldwin County, Alabama, "no property  
found", the plaintiff now requests in writing that the Clerk of  
this Court will issue a notice to the above named defendant re-  
quiring him, within thirty days from the service of such notice,  
to file in this cause, a statement in writing, under oath, of  
all of his assets of every kind, character and description and  
wheresoever located as provided by Code 1940, Title 7, Section  
903.

C. L. Thompson  
Attorney for plaintiff.

FILED

JUL 10 1967

ALICE L. DICK, CLERK  
REGISTER

HUGH ROZELLE  
ATTORNEY-AT-LAW  
ATMORE, ALABAMA 36502

PHONES { OFFICE 368-3549  
RESIDENCE 368-2676

August 14, 1967

~~Mrs. Alice Duck~~  
Clerk of the Circuit Court  
Bay Minette, Alabama

Re: Ratcliff's Firestone, Inc., a Corporation, Plaintiff vs  
H. R. Williams, Defendant

Dear Mrs. Duck:

I am enclosing, herewith, self-explanatory  
statement in writing under oath on behalf of Mr. H. R.  
Williams.

With kindest regards, I am

Sincerely,



HUGH ROZELLE

HR/mm

Enclosure

RATCLIFF'S FIRESTONE, INC.,	)	IN THE CIRCUIT COURT
a corporation,	)	
	)	TWENTY-EIGHTH JUDICIAL CIRCUIT
Plaintiff,	)	
	)	OF BALDWIN COUNTY
v.	)	
	)	
HEGGARD R. WILLIAMS,	)	
	)	
Defendant,	)	
	)	
EMPIRE LIFE INSURANCE COMPANY	)	
OF AMERICA, a corporation	)	
	)	
Garnishee.	)	No. 6743 1/2

ANSWER OF GARNISHEE  
DENYING INDEBTEDNESS

Personally appeared before me, a Notary Public, in and for said State and County, Dale R. Major, who is personally known to me, who being by me duly sworn, on oath says, that he is the agent of the Empire Life Insurance Company of America for making answers in garnishment cases, and as such agent has authority to make answer for the garnishee in the above stated case, and answering the garnishment therein he says that the garnishee is not now indebted to the defendant in any sum whatever, and was not indebted to him at the time of the service of this garnishment, nor at any time intervening between the time of the service of the garnishment and the making of this answer, and that it will not be indebted in the future to said defendant by any contract then or now existing and that the said defendant is no longer an agent for this company and has no vested renewal commissions, and that the garnishee will not be liable to the defendant for the delivery of personal property by any contract then or now existing, for the delivery of personal property, nor for the payment of money which may be discharged for the delivery of personal property, or which is



payable in personal property, and that it has not in  
its possession or under its control money or effects  
belonging to the defendant.

EMPIRE LIFE INSURANCE COMPANY OF  
AMERICA

BY

*Dale S. Mayo*

Sworn to and subscribed before  
me this the 30<sup>th</sup> day of March,  
1967.

*Margaret Sue McGraw*  
*Dallas County, Texas*

FILED

APR 6 1967

MEL 1000

674 3 1/2

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 ..... day of....., 19....., being a regular day of said term, Ratcliff's Firestone, Inc., a corporation

recovered judgment against Heggard R. Williams

for the sum of Five Hundred Thirty-one and 36/100----- Dollars, and cost of suit, and affidavit having been made by C. Lenoir Thompson that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Empire Life Insurance Company of America, xxxxxxxxxxxxxxxxxxxxxxx  
xxxxxxxxxxxxx Birmingham, 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 .....

Empire Life Insurance Company of America, xxxxxxxxxxxxxxxxxxxxxxx  
xxxxxxxxxxxxx Birmingham, 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 first Monday in January 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 ..... 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 Heggard R. Williams

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

Witness, ALICE J. DUCK, Clerk of said Court, this 18 day of Aug, A. D., 1967

Issued 18 day of Aug, A. D., 1967

ATTEST:

Alice J. Duck, Clerk.

LAW OFFICES  
DERAMUS & JOHNSTON  
TWELFTH FLOOR BANK FOR SAVINGS BUILDING  
BIRMINGHAM, ALABAMA 35203  
TELEPHONE 322-0616

HARVEY DERAMUS  
GILBERT E. JOHNSTON  
JAMES C. BARTON  
G. BURNS PROCTOR, JR.  
ALFRED M. NAFF  
R. RICHARD SCHWEITZER  
SYDNEY LAVENDER  
DONALD L. COLLINS  
ALAN W. HELDMAN  
JEROME K. LANNING  
DON B. LONG, JR.  
THOMAS E. MAXWELL

HUNTSVILLE OFFICE  
TERRY HUTCHENS BUILDING  
ROBERT SELLERS SMITH  
RESIDENT PARTNER

April 3, 1967

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

Re: Case No. 6743-1/2  
Ratcliff's Firestone, Inc., a corporation  
v. Heggard R. Williams and Garnishee,  
Empire Life Insurance Company of America

Dear Miss Duck:

Enclosed is Answer of Garnishee Denying Indebtedness in the above-styled cause. We shall appreciate your filing this, having the extra copy marked "filed" and returning it to our office in the enclosed self-addressed stamped envelope.

Yours very truly,



Donald L. Collins

DLC/jc

Encs.

cc - Empire Life Insurance Company of America

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 .....day of....., 19....., being a regular day of said term, Ratcliff's Firestone, Inc., a corporation

recovered judgment against Heggard R. Williams

for the sum of Five Hundred Thirty-one and 36/100--- Dollars, and cost of suit, and affidavit having been made by C. LeNoir Thompson that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Empire Life Insurance Company of America, Birmingham, 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 .....

Empire Life Insurance Company of America, Birmingham, 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~~ within thirty days from service hereof 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~~ of 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.....Heggard R. Williams

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

Witness, ALICE J. DUCK, Clerk of said Court, this 3rd day of February A. D., 1962

Issued .....day of .....A. D., 19.....

ATTEST:

Alice J. Duck, Clerk.

1463  
RECEIVED

RECEIVED IN OFFICE  
FEB 3 1967  
FEB 6 1967  
TAYLOR WILKINS  
SHERIFF  
M. S. BUTLER, Sheriff

Executed by serving 2 copies of  
the within on Walter L. Hargrave  
Superintendent  
of Insurance, State of Alabama  
This The 6 day of Feb 1967

Sheriff of Montgomery County

M. S. Butler,

By J. L. McNeill D. S.

The Sheriff claims \$1.00 travel ex-  
pense on each of 1  
process(es) or a total of \$ 1.00

M. S. Butler, Sheriff  
Montgomery County,  
Alabama.

CIRCUIT COURT, BALDWIN COUNTY

No. 6742 1/2

Rabcliff's Firestone  
Inc. - a corp.

VS.

GARNISHMENT ON JUDGMENT

Heyward R. Williams

Issued 3rd day of Feb 1967

Returnable        day of        19      

C. Lennix Thompson  
Attorney

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

State Superintendent of Ins.  
Montgomery -

RATCLIFF'S FIRESTONE, INC.,	)	IN THE CIRCUIT COURT OF
A Corporation,	)	BALDWIN COUNTY, ALABAMA.
PLAINTIFF,	)	AT LAW.
VS.	)	NUMBER: 6743
H. R. WILLIAMS,	)	
DEFENDANT.	)	

TO THE HONORABLE TELFAIR J. MASHBURN, JUDGE OF SAID COURT:

I, H. R. WILLIAMS, a resident of Baldwin County, Alabama, do hereby make and sign this my statement in writing under oath listing all of my assets and encumbrances in accordance with the Code of Alabama 1940, Title 7, Section 903, as follows:

Money: \$75.00

Chose in action: None

Notes: None

Bonds: None

Accounts: None

Property: Purchasing a home owned jointly with wife, at 1603 McMillan Street, Bay Minette, Alabama, having obligated to pay to-wit, \$14,000.00 with Liberty National Insurance Company holding a mortgage on same in the amount of, to-wit, \$9,895.74.

Property: One 1965 Two Door Oldsmobile having paid some \$4,200.00 for same with a balance due in the amount of to-wit, \$1,939.36, financed with the Baldwin County Bank, Bay Minette, Alabama, who holds a note and mortgage on said automobile.

Property: Purchasing jointly with wife, property at Week's Bay, Baldwin County, Alabama, purchase price being \$11,500.00, with Mr. Ducan Turnbull, of Point Clear, Alabama, holding a note and mortgage in the amount of to-wit, \$1,455.00, and the Merchants National Bank of Mobile, Alabama, holding a note and mortgage in the amount of to-wit, \$9,747.55.

Property: One inboard and outboard off shore fishing rig purchased at a cost of some \$4,500.00 in 1962 with a balance

due of \$1,100.00 with the Baldwin County Bank of Bay Minette, Alabama, holding a mortgage on same, which rig was involved in a wreck and being a total loss and insurance company paid off said note and mortgage and in the insurance settlement the insurance company made a down payment on a 14 foot skift at a cost of to-wit, some \$834.00, the Baldwin County Bank of Bay Minette, Alabama, presently holding a note and mortgage in the amount of to-wit, \$560.00.

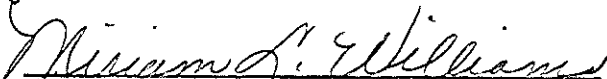
Household furniture and furnishings in the home of the parties owned by wife which is mortgaged to the Baldwin County Bank, Bay Minette, Alabama.

The said H. R. Williams is employed by Empire Life Insurance Company of America, 712 Commerce Street, Dallas, Texas, and earns a draw of \$200.00 per week and at the present time does not make any more than his draw, and is indebted to said insurance company in the amount of to-wit, \$4,200.00.

There are no other liens, mortgages or encumbrances on said property other than judgment obtained by Ratcliff's Firestone, Inc., a corporation.


  
H. R. WILLIAMS

Sworn to and subscribed before me, a Notary Public, this 14th day of August, 1967.

  
NOTARY PUBLIC

My Commission Expires May 15, 1971

I hereby certify that a copy of the foregoing was mailed to C. LeNoir Thompson, Attorney at Law, Bay Minette, Alabama, attorney for Ratcliff's Firestone, Inc., a Corporation, at his address, Bay Minette, Alabama, postage duly prepaid this the 14th day of August, 1967.

  
HUGH ROZELLE,  
Attorney for Defendant.

FILED

AUG 16 1967

ALICE I. DICK, CLERK  
REGISTER

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 .....day of....., 19....., being a regular day of said term, Ratcliff's Firestone, Inc., a corporation

recovered judgment against Heggard R. Williams

for the sum of Five Hundred Thirty-one and 36/100----- Dollars, and cost of suit, and affidavit having been made by C. LeNoir Thompson that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Empire Life Insurance Company of America, 712 Commerce Street  
Birmingham, 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 .....

Empire Life Insurance Company of America, 712 Commerce Street,  
Birmingham, 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 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 ..... 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..... Heggard R. Williams

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

Witness, ALICE J. DUCK, Clerk of said Court, this..... day of Aug-, A. D., 1967

Issued ..... day of Aug-, A. D., 1967

ATTEST:

Alice J. Duck, Clerk.



Not listed in  
B. Lar.  
received 18 day of Aug. 1967  
on day of 19  
er and a copy of the within Blair  
Empire Life & Ins. Co. of  
American  
service on

TAYLOR WILKINS, Sheriff  
By \_\_\_\_\_ D. S.

CIRCUIT COURT, BALDWIN COUNTY

No. 6743 1/2

Batchiff's Limestone

VS. } GARNISHMENT ON JUDGMENT

Haggard R. Williams

Serve:  
Empire Life & Ins. Co  
of America - Birmingham  
Issued \_\_\_\_\_ day of \_\_\_\_\_ 19  
Superintendent of Insurance  
Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19

C. Lewis Thompson  
Attorney

3365  
RECEIVED IN OFFICE  
AUG 25 1967  
M. S. BUTLER, Sheriff

Executed by serving 2 copies of  
the within on Walter Hansel  
Superintendent  
of Insurance, State of Alabama  
This The 25 day of Aug. 19 67  
Sheriff of Montgomery County  
M. S. Butler,  
By W. L. Mason D. S.

M. S. Butler, Sheriff of Montgomery  
County, Alabama, Claim \$1.50 each\* for  
serving 1 process(es) and \$1.00  
travel expense on each of 1  
process(es) or a total of \$2.50

W. L. Mason Deputy Sheriff

NOTICE TO DEFENDANT

RATCLIFF'S FIRESTONE, INC., X  
a corporation

Plaintiff

vs

H. R. WILLIAMS

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6743

TO H. R. WILLIAMS:

Take notice that upon the written request of C. LeNoir Thompson, attorney for the plaintiff, filed in this court in this cause, you are commanded to file in this court within thirty days from the service of this notice a statement in writing, under oath, of all your assets, including money, choses in action, notes, bonds and accounts, and all other property, real, personal or mixed or any interest therein, including wages due or payable, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, encumbrances or mortgages.

Be governed accordingly.

Dated this 10 day of July, 1967.

C. LeNoir Thompson  
Clerk of the Circuit Court, Baldwin County  
Alabama.

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

YOU ARE HEREBY COMMANDED to serve a copy of the above notice upon H. R. Williams and make due return thereon, according to law.

Witness my hand this the \_\_\_\_\_ day of \_\_\_\_\_, 1967.

\_\_\_\_\_  
Clerk, Circuit Court of Baldwin County,  
Alabama.

no. 6743

Received 11 day of July 1967  
and on 19 day of July 1967  
I served a copy of the within Writ of Discovery  
on H. R. Williams

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

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.

Radcliff's Firestone

05

H. R. Williams

Writ of Discovery

C. L. L.

RELEASE OF GARNISHMENT

CIRCUIT Court of BALDWIN County, Alabama

RE: RATCLIFF'S FIRESTONE, INC., A Corp., Plaintiff.  
vs.

HEGGARD R. WILLIAMS, Defendant.

To: Empire Life Insurance Co., of America, GARNISHEE

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that in the above styled case, Garnishment has been released and Garnishee has been discharged.

Witness my hand, this the 11th day of September, 1967

Alice J. Duck CLERK.

STATE OF ALABAMA

DEPARTMENT OF INSURANCE

I, the undersigned as Superintendent of Insurance for the State of Alabama,  
hereby certify that on the 25th day of August, 1967, I sent  
by registered mail in an envelope as follows:

Empire Life Insurance Company of America  
1212 Bank for Savings Building  
Birmingham, Alabama 35203

REGISTERED MAIL  
RETURN RECEIPT REQUESTED

bearing sufficient prepaid postage, a copy of a summons and complaint served upon  
me by the Sheriff of Montgomery County, Alabama, in a cause styled as follows:

Ratcliff's Firestone, Inc., a corporation, Plaintiff

in the Circuit Court of Baldwin County

VERSUS

Heggard R. Williams, Defendant, and

(Name of Court)

Empire Life Insurance Company of America,  
Garnishee, Defendant

And that on the 5th day of September, 1967, I received  
the return card showing receipt by the designated addressee of said envelope on  
the 31st day of August, 1967.

Witness my hand and official seal this the 12th day of September,  
1967.

Walter J. Houseal  
SUPERINTENDENT OF INSURANCE

WRIT OF DISCOVERY

RATCLIFF'S FIRESTONE, INC., X  
a corporation

Plaintiff

VS

H. R. WILLIAMS

Defendant

X

X

X

X

X

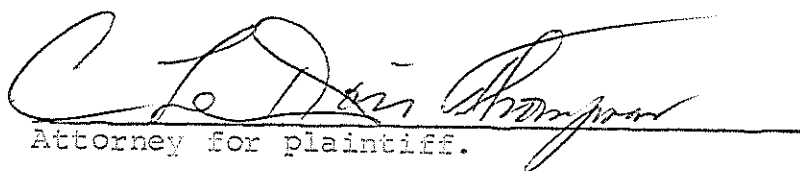
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 674-3

The plaintiff herein having recovered on the 1st day of December 1965, a judgment against the defendant in the above styled cause for the sum of \$ 531.36 and costs in the sum of \$ \_\_\_\_\_ and such execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "no property found", the plaintiff now requests in writing that the Clerk of this Court will issue a notice to the above named defendant requiring him, within thirty days from the service of such notice, to file in this cause, a statement in writing, under oath, of all of his assets of every kind, character and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

  
Attorney for plaintiff.

FILED

JUL 10 1967

ALF L. DICK, 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 C. LeNoir Thompson who being duly sworn, on oath says, that a regular Term of the Circuit Court of Baldwin County, to-wit: on the 1st day of December 1965, Ratcliff's Firestone, Inc., a corporation recovered a judgment against Heggard R. Williams

Five Hundred Thirty-one and 36/100 (\$531.36) for the sum of Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that Empire Life Insurance Company of America, 112 Commerce Street

Dallas, Texas Birmingham, Alabama supposed to be indebted to or have effects of the said Heggard R. Williams in its possession, or under its control, and that he believes process of Garnishment against said Heggard R. Williams is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 18 day of Aug. A. D. 1967  
Alice J. Duck  
Clerk.

C. LeNoir Thompson

State of Alabama  
BALDWIN COUNTY

TO Heggard R. Williams, Defendant:

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

RATOLIFF'S FIRESTONE, INC., a corporation, Plaintiff,

versus HEGGARD R. WILLIAMS, Defendant,

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

Empire Life Insurance Company of America, ~~XXXXXXX~~  
~~XXXXXX~~ Birmingham, Alabama

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 18th

day of August, 1946.

Alice J. Luck  
Clerk of the Circuit Court

24, 8-14-67



Received 18 day of Aug. 1967  
and on 14 day of Aug. 1967  
I served a copy of the within notice  
on Heggard R. Williams  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By W. A. Talbert

NOTICE  
TO DEFENDANT OF GARNISHMENT

BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO

~~HEGGARD R.~~

RATCLIFF'S FIRESTONE, INC.,

a corporation

Plaintiff

VS.

HEGGARD R. WILLIAMS

Defendant