

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P.O. DRAWER 190  
AREA CODE 205 - PHONE WH 3-2201  
FOLEY, ALABAMA 36535

May 21, 1965

Honorable Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama

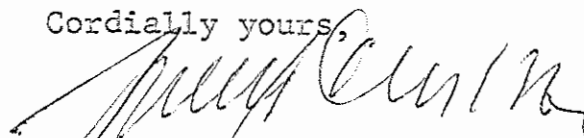
Re: Royal Oil Company  
Vs: Dana Dugger  
\$176.40

#6416

Dear Judge:

Please render a judgment on the sworn to itemized statement for \$176.40 plus interest at 6% from July 1, 1962, which would be at least \$20 for a total of \$196.40.

Cordially yours,

  
FOREST A. CHRISTIAN

SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons DANA DUGGER, 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 ROYAL OIL COMPANY, a Texas corporation.

Witness my hand this the 3 day of March, 1965.

David J. Church  
Clerk

\* \* \* \* \*

COMPLAINT

ROYAL OIL COMPANY, a  
Texas corporation,

PLAINTIFF,

VS:

DANA DUGGER,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 40/100 DOLLARS (\$176.40), due from him by account on, to wit: the 1st day of July, 1962, which sum of money, with interest thereon is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 40/100 DOLLARS (\$176.40), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of July, 1962, which sum of money, with interest thereon is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 40/100 DOLLARS (\$176.40), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of July, 1962, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 12th day of February, 1965.

Forest A. Christian, Jr.  
Forest A. Christian, Attorney for the Plaintiff

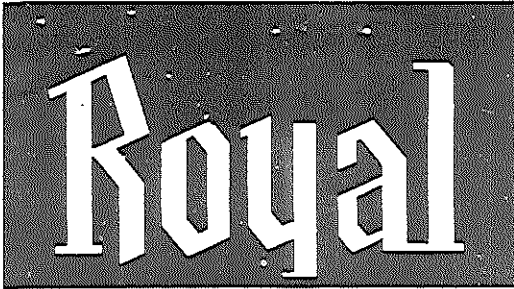
Defendant's address is:  
Route 1#, Box 63  
Foley, Alabama 36535

EX-3-4-65

FILED

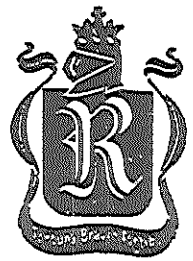
MAR 3-65

CLERK OF COURT  
BALDWIN COUNTY, ALABAMA



Hallmark of Quality For Over 30 Years

# OIL COMPANY



P. O. Box 646 • Fort Worth 1, Texas

CHARGE TO

Dana Dugger  
Route 1, Box 63  
Foley, Alabama

SHIP TO

Same

SALESMAN

A. J. Skrmetta

	DATE			INVOICE NO.
6-15	6	19	62	19302

TERMS

DATE DUE

December 15, 1962

WHAT SHIPPED	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT	
1 - 40	Royal Thermal Moly	40	53	21	20
1 - 55	Royal Heavy Duty Diesel Oil SAE 40	55	1 33	73	15
				94	35
	ALA. ST. EX. TAX			1	20
	FED. TAX			3	30
				98	85

I Certify that the above bill is correct and just and that payment has not been received.

VIA: MOTOR FRT.

*Lenard G. Moore, Comptroller*  
 Title  
*Shada Selman* Notary Public

# Royal

Hallmark of Quality For Over 30 Years

## OIL COMPANY



P. O. Box 646 • Fort Worth 1, Texas

CHARGE TO

Dana Dugger  
Route 1, Box 63  
Foley, Alabama

SHIP TO

Same

SALESMAN

A. J. Skrmetta

			DATE	INVOICE NO.
9-13	9	17	62	20335

TERMS

DATE DUE

April 15, 1963

WHAT SHIPPED	DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
1 - 55	Royal H. D. Cushion Motor Oil SAE 40	55	1 33	73 15
	ALA. ST. EXC. TAX			1 10
	FED. TAX			3 30
				<hr/> 77 55

I Certify that the above bill is correct and just and that payment has not been received.

*Leonard L. Moore*  
Title \_\_\_\_\_  
*Steda Selman*  
Title \_\_\_\_\_

228

OVER 30 YEARS SERVICE TO THE FINEST FOLKS ON EARTH . . . OUR CUSTOMERS.

1716414

SUMMONS

ROYAL OIL COMPANY, a Texas corporation,

PLAINTIFF,

VS:

DANA DUGGER,

DEFENDANT.

Received 3 day of March 1965  
and on 4 day of March 1965  
I served a copy of the within Summons  
on Dana Dugger  
By service on Above

TAYLOR WILKINS, Sheriff  
By Jm Eastburn D. S.  
Foley, Ala

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY Jm Eastburn  
DEPUTY SHERIFF

FILED  
MAR 3 1965  
JIM BARKER, CLERK  
REGISTRAR

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

COPY

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P.O. DRAWER 190  
FOLEY, ALABAMA 36535

AREA CODE 205  
WH 3-2201

March 26, 1966

Hale Manufacturing Company  
P. O. Drawer 729  
Foley, Alabama

ATTENTION: June Haupt, Office Manager

Re: Royal Oil Company  
Vs: Dana Dugger  
Case No. 6416½

Gentlemen:

Reference is made to your letter of March 21, 1966, addressed to Mrs. Alice J. Duck, Clerk, Circuit Court of Baldwin County, Bay Minette, Alabama, concerning the case mentioned above, in which you state that Dana Dugger is employed and that you will deduct 25% of his wages after taxes, etc. until the total amount of \$196.00 is collected.

Although Mr. Dugger has filed a claim of exemption, the statute provides that the amount of exemption is 75% and that 25% should be paid to the Court.

This is entirely in agreement with your letter, so please continue to withhold 25% of his wages without fail.

Cordially yours,

FOREST A. CHRISTIAN

cc: Arthur C. Epperson, Esq.  
Attorney at Law  
Foley, Alabama 36535

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

6416 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 FOREST A. CHRISTIAN

who being duly sworn, on oath says, that a regular May 1965 Term of the Circuit Court of Baldwin County, to-wit: on the 27th day of May

1965, ROYAL OIL COMPANY, a Texas corporation, recovered a judgment against DANA DUGGER

for the sum of ONE HUNDRED NINETY-SIX & 40/100 (\$196.40) Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that HALE MANUFACTURING COMPANY, Foley, Alabama,

supposed to be indebted to or have effects of the said DANA DUGGER in its possession, or under its control, and that he believes process of Garnishment against said HALE MANUFACTURING COMPANY, Foley, Alabama is necessary to obtain satisfaction of said judgment.

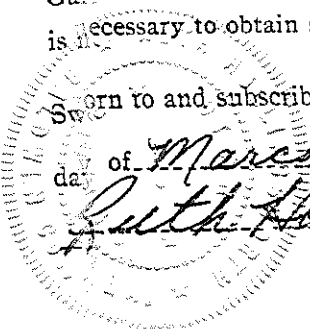
Sworn to and subscribed this the 15th day of March

Ruth Hollingsworth  
Clerk.

A. D. 1966

FILED  
Forest A. Christian

APR 16 1966  
ALICE J. DUCK  
CLERK  
REGISTER



STATE OF ALABAMA

Baldwin County

CASE NO. 6416½

TO Dana Dugger, Defendant:

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

Royal Oil Company, a Texas Corporation, Plaintiff

versus Dana Dugger, Defendant

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

Hale Manufacturing Company, Foley, Alabama

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

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

16th day of March, 19.66...

Alice J. Cook
Clerk of the Circuit Court.

64-3-18-66



Received 16 day of March 1966  
and on 18 day of March 1966

I served a copy of this with Notice  
on Dana Dugger

By service on above

TAYLOR WILKINS, Sheriff  
By Jm Coathune  
Foley, Ala.

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
By Jm Coathune  
DEPUTY SHERIFF

**NOTICE**  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO  
Dana Dugger

ROYAL OIL COMPANY, A TEXAS CORP.

Plaintiff....

VS.

DANA DUGGER

Defendant....

F.A. Christian, Attorney

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

May TERM, 1965

#6416 1/2

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular May Term, 1965, of the Circuit Court of Baldwin County, to-wit: On the 27th day of May, 1965, being a regular day of said term, ROYAL OIL COMPANY, a Texas Corporation

recovered judgment against DANA DUGGER

for the sum of ONE HUNDRED NINETY-SIX & 00/100 (\$196.00) 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:

HALE MANUFACTURING COMPANY, Foley, Alabama,

has or is believed to have in its possession, or under its control money or effects belonging to said defendant DANA DUGGER 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 Comanded to Summon HALE MANUFACTURING Company, Foley, 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 Monday in ----- A. D. 19-----, 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 it answer, or at any time intervening the time of serving the garnishment, and making the answer it was ----- indebted to said defendant DANA DUGGER 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 DANA DUGGER

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

Witness, ALICE J. DUCK, Clerk of said Court, this 16th day of March, A. D., 1966

Issued 16th day of March A. D., 1966.

67-3-18-66

ATTEST:

Alice J. Duck, Clerk.  
Alice J. Duck

Served 16 day of March 1966  
at 18 day of March 1966  
a copy of the within Garn.  
Hale Manufacturing Co.

service on above David Blackaby  
(Asst. Mgt.)

TAYLOR WILKINS, Sheriff  
By Jm Eastburn  
Foley, Ala

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 17.20  
TAYLOR WILKINS, Sheriff  
BY Jm Eastburn  
DEPUTY SHERIFF

**Circuit Court, Baldwin County**

No. 6416 1/2

ROYAL OIL COMPANY, A Texas Corp.  
Plaintiff,

VS. } Garnishment On Judgment

DANA DUGGER,  
Defendant

Hale Manufacturing Co., Foley,  
Garnishee

Issued 16th day of March 1966

Returnable        day of        19      

Forest A. Christian  
Attorney

STATE OF ALABAMA

CLAIM OF EXEMPTION

BALDWIN COUNTY

ROYAL OIL COMPANY, a )  
 Texas Corporation )  
 Plaintiff )  
 )  
 VS. )  
 )  
 DANA DUGGER )  
 Defendant )  
 )  
 HALE MFG. COMPANY, )  
 Garnishee )

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 AT LAW  
 Case No. 6416½

Before me, Arthur C. Epperson, a Notary Public, in and for the State of Alabama, at large, personally appeared DANA DUGGER, known to me, who being by me first duly sworn on oath deposes and says: that he is a resident of this State and that he owns not exceeding \$1000.00 personal property, choses in action and money; and affiant files this his plea of exemptions, and claims as exempt his wages and salary which are due him from said garnishee, and which do not exceed the sum of \$150.00, against any and all debts and processes of garnishment which has or may issue for the collection of a certain debt alleged to be due by the affiant to ROYAL OIL COMPANY, the plaintiff, for which debt suit has been instituted and judgment recovered in the Circuit Court of Baldwin County, Alabama, and the affiant states that the personal property, choses in action and money now owned by him are as follows:

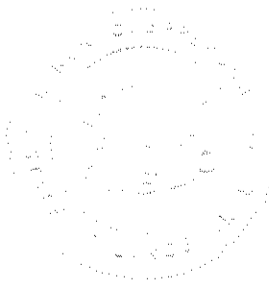
Equity of \$100.00 in 1965 Chev. Pick-up truck.  
 none other.

*Dana Dugger*

~~Sworn to and subscribed before me this the 21st day of~~

March, 1966.

*Arthur C. Epperson*  
 Notary Public



FILED

MAR 22 1966

CLERK REGISTER

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA

March 21, 1966

AREA CODE 510  
TELETYPE 942-2851

AREA CODE 205  
TELEPHONE 943-8611

Mrs. Alice J. Duck, Clerk  
CIRCUIT COURT OF BALDWIN COUNTY  
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Royal Oil Company  
VS  
Dana Dugger

6416/m

We as Garnishee in the above case wish to inform you that Dana Dugger is employed by us and that we are indebted to him. As of week ending March 20, 1966, we will deduct 25% out of his wages after taxes, sui and social security have been deducted.

We will withhold the total amount of \$196.00. If this amount does not agree with your figures, please advise.

If we can be of further help in the above matter, please let us know.

Sincerely,

THE HALE MANUFACTURING COMPANY

*June Haupt*  
(Mrs.) June Haupt  
Office Manager

h

116

FILED  
MAR 22 1966  
ALICE J. DUCK, CLERK  
REGISTERED

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

ANSWER TO DEFENDANT'S CLAIM  
OF EXEMPTION

ROYAL OIL COMPANY, a  
Texas Corporation,

X

PLAINTIFF,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

VS:

X

AT LAW

DANA DUGGER,

X

CASE NO. 6416½

DEFENDANT,

X

HALE MANUFACTURING COMPANY,

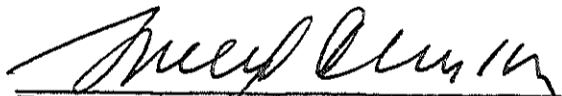
X

GARNISHEE.

X


Comes the Plaintiff in this case and for answer to the claim of exemptions filed by the Defendant in the garnishment of the wages from HALE MANUFACTURING COMPANY, says as follows:

That under Title 7, Section 630, Code of Alabama, "That the wages, salaries, or other compensation of laborers or employees residents of this state, for personal services shall be exempt from levy under writs of garnishment. In an amount equal to seventy-five percent of such wages, salaries or other compensation due or to become due to such laborers or employees...The garnishee shall retain twenty-five per cent of the wages, salaries, or other compensation due to become due to such employees or laborers during such period of time as is necessary to accumulate a sum equal to the amount shown as due by the Court on the writ or levy, at which time the garnishee shall pay the same into Court."



Forest A. Christian, Foley, Alabama  
Attorney for the Plaintiff

I hereby certify that I have mailed  
copies of this pleading to the following  
by post-paid, ARTHUR EPPERSON, Esq.,  
Foley, Alabama; and Hale Manufacturing  
Company, P. O. Drawer 729, Foley, Alabama.



Forest A. Christian, Attorney for the  
Plaintiff.

FILED

APR 11 1933

FILED

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA

June 27, 1966

AREA CODE 510  
TELETYPE 942-2851

AREA CODE 205  
TELEPHONE 943-8611

Mrs. Alice J. Duck, Clerk  
CIRCUIT COURT OF BALDWIN COUNTY  
Bay Minette, Alabama

Re: Royal Oil Company  
VS:  
Dana Dugger  
Hale Manufacturing Co.,  
Garnishee

*no. 6416 1/2*

Dear Mrs. Duck:

Please be advised that Mr. Dana Dugger is no longer employed by us. He terminated on June 17, 1966 in order to farm - self employed.

We are enclosing a check for \$157.25, the total amount deducted from his earnings.

If we can be of further service, please call on us.

Sincerely yours,

THE HALE MANUFACTURING COMPANY

*June Haupt*  
(Mrs.) June Haupt  
Office Manager

FILED  
JUN 28 1966  
ALICE J. DUCK, CLERK  
REGISTER

/h

enclosure

cc: Forest A. Christian  
Attorney at Law