

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 -- PHONE 943-2201

FOLEY, ALABAMA 36535

January 14, 1966

Honorable Telfair Mashburn  
Circuit Judge  
Bay Minette, Alabama

Wayne  
Re: /Hollis, d/b/a Hollis  
Furniture Company  
Vs: John Sanspree  
Case No. 6588

Dear Judge Mashburn:

Kindly render a judgment in the case mentioned above  
on a sworn to itemized statement of account in the amount  
of \$639.90 principal, \$20 interest, for a total of \$659.90.

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 JOHN SANSPREE, 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 WAYNE HOLLIS, d/b/a HOLLIS FURNITURE COMPANY.

Witness my hand this the 12 day of July, 1965.

W. J. French  
Clerk

\* \* \* \* \*

COMPLAINT

WAYNE HOLLIS, d/b/a HOLLIS  
FURNITURE COMPANY,

PLAINTIFF,

VS:

JOHN SANSPREE,

DEFENDANT.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

7-6-65

COUNT I:

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-NINE & 90/100 DOLLARS (\$639.90), due from him by account on, to wit: the 9th day of July, 1965, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-NINE & 90/100 DOLLARS (\$639.90), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 9th day of July, 1965, which sum of money, with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant SIX HUNDRED THIRTY-NINE & 90/100 DOLLARS (\$639.90), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant, on to wit: the 9th day of July, 1965, which sum of money, with interest thereon is still unpaid.

COUNT IV:

Said purchase was made on a purchase agreement signed by the Defendant and which provides for a reasonable attorney's fee which the Plaintiff alleges to be \$120.

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 9th day of July, 1965.

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

Defendant's Address is:

Foley, Alabama )

EX-8-12-65

FILED

JUL 12 1965

REC 1 1965

417

# HOLLIS FURNITURE COMPANY

PHONE WH 3-2941

P. O. BOX 572

109 S. MCKENZIE STREET

Foley, Alabama

Oct 3. 63

George town 2 pr L. R. Suit Sofa - CHAIR

" Arm chair

" Armless chair

293.50

Model #

Serial #

831-m Mantel Stereo console phonograph 2753

155.95

221-280-0 Norge Auto Washer

w 746770-

223.75

5012 Zenith table Radio

AD-50

46.80

725.00

9-3-63

CASH DOWN

180.00

545.00

CHARGES

81.75

626.75

Due 3 ~~Seasonal~~ Seasonal payment  
all due 12-4-64  
total Amount of contract

100.00 due on Nov 25 1963 Not PAID

263.37 due on 6-25-1964 Not PAID

263.38 due on 12-4-1964 Not PAID

2-26-64 Wayne check for 100.00 PAID

9-8-64 set up fee PAID BY HOLLIS

13.15

I do hereby certify that this is a true  
and correct statement of this account. total due

639.90

Wayne Hollis  
Wayne Hollis

Contract own by Rodrico Inc on full recourse

Sworn to and subscribed before me  
on this the 9th day of July, 1965.

Notary Public, Baldwin County, Alabama

Forest A. Christian

Notary Public

Baldwin County, Ala.

My Commission Expires Dec. 20, 1965

418

710.6588

SUMMONS AND COMPLAINT

WAYNE HOLLIS, d/b/a HOLLIS  
FURNITURE COMPANY,

PLAINTIFF,

VS:

JOHN SANSPREE,

DEFENDANT.

Received 12 day of July 1965  
and on 13 day of Aug. 1965  
I served a copy of the within etc  
on John Sanspree  
By service on Alison

TAYLOR WILKINS, Sheriff  
By J. M. Eastman D. S.  
Magnolia Springs

Sheriff's claim 84 miles to  
Ten Cents per mile total \$ 8.40  
BY J. M. Eastman  
TAYLOR WILKINS, Sheriff

FILED  
JUL 12 1965  
JUL 12 1965

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

JANUARY TERM, 1966

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, WAYNE HOLLIS, d/b/a HOLLIS FURNITURE COMPANY  
recovered judgment against JOHN SANSAPREE

for the sum of SIX HUNDRED FIFTY-NINE & 90/100 (\$659.90) Dollars, and cost of suit,  
and affidavit having been made by ROBERT 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:

KUEHMANN FOODS, INC., c/o ERNEST BRENFORT, 1228 Oakwood Avenue,  
Toledo, Ohio

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant John Sansapree 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

KUEHMANN FOODS, INC., 1228 Oakwood Avenue, Toledo, Ohio

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 March A. D. 1966,  
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 its answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer it was indebted to said defendant  
JOHN SANSAPREE 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 JOHN SANSAPREE

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

Witness, ALICE J. DUCK, Clerk of said Court, this 24 day of March, A. D., 1966.

Issued 24 day of March, A. D., 1966.

ATTEST:

Alice J. Duck, Clerk.

Circuit Court, Baldwin County

No.

65866 1/2

VS. } Garnishment On Judgment

Issued

24

day of

March 1966

Returnable

day of

19

Attorney

June 8, 1966

Mr. Fred S. Ball, Jr. and Richard A. Ball  
200 South Lawrence Street  
Montgomery, Alabama

Gentlemen:

Re: Wayne Hollis, d/b/a Hollis  
Furniture Company  
vs: John Sanspree  
Kuehmann Foods, Inc., Garnishee.

Judgment was rendered in the above styled cause on the 6th day of June, 1966, in favor of the Plaintiff and against the garnishee, Kuehmann Foods, Inc., for the amount of \$659.90.

No answer has been filed in this cause by Kuehmann Foods, Inc., Garnishee.

Yours very truly,

Circuit Clerk

cc: Kuehmann Foods, Inc.,  
1228 Oakwood Ave.  
Toledo, Ohio

Hon. Forest A. Christian  
Foley, Alabama

AD/eb



MRS. AGNES BAGGETT  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104

March 22, 1966

Mr. Forest A. Christian  
P. O. Drawer 190  
Foley, Alabama

Re: Kuehmann Foods, Inc.

Dear Mr. Christian:

In reply to your letter of March 21, I wish to advise that the foreign corporation records on file in this office disclose that the above named Ohio corporation qualified in Alabama on November 10, 1952. The statutory agents are shown to be Fred S. Ball, Jr. and Richard A. Ball, 200 South Lawrence St., Montgomery, Alabama.

With best wishes, I am

Sincerely yours,

*Mrs. Agnes Baggett*

Mrs. Agnes Baggett  
Secretary of State

EH/kd



FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P. O. DRAWER 190  
AREA CODE 205 - PHONE 943-2201  
FOLEY, ALABAMA 36535

June 4, 1966

Honorable Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama

Re: Wayne Hollis, d/b/a Hollis  
Furniture Company  
Vs: John Sanspree  
Case No. 6588½

Dear Judge Mashburn:

Kindly enter a judgment against Kuehmann Foods, Inc.,  
as garnishee in the amount of \$659.90 plus Court costs.

Cordially yours,

  
FOREST A. CHRISTIAN

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

JANUARY

TERM, 1966

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, WAYNE HOLLIS, d/b/a HOLLIS FURNITURE COMPANY

recovered judgment against JOHN SANSPREE

for the sum of SIX HUNDRED FIFTY-NINE & 90/100 (\$659.90) 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:

KUEHMANN FOODS, INC., c/o ERNEST BRENFORT, 1228 Oakwood Avenue,  
Toledo, Ohio

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant John Sanspree 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

KUEHMANN FOODS, INC., 1228 Oakwood Avenue, Toledo, Ohio

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. 1966,  
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 its answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer it was indebted to said defendant  
JOHN SANSPREE 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 JOHN SANSPREE

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

Witness, ALICE J. DUCK, Clerk of said Court, this 24 day of March, A. D., 1966.

Issued 24 day of March, A. D., 1966.

ATTEST:

EX. 3-25-66

420

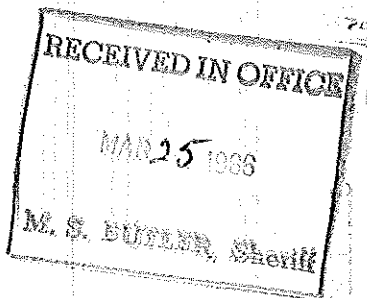
Alice J. Duck, Clerk.

RECEIVED

MAR 24 1966

TAYLOR WILKINS  
CLERK

2579



EXECUTED BY SERVING A  
COPY OF THE WITHIN ON

Ball + Ball as  
Agt for Kuehmann  
Foods, Inc.

This the 25 day of March 1966

M. S. BUTLER  
Sheriff Montgomery County

By Walker  
Deputy Sheriff

Judgt 659.90  
26.40

Circuit Court, Baldwin County

No. 65-82 1/2

Wayne Hollis, d/b/a  
Hollis Furniture Co

VS. } Garnishment On Judgment

John Sunspree

Kuehmann Foods  
Inc.  
Karnichee

Issued 24 day of March 1966

Returnable day of 19

Attorney

State of Alabama

BALDWIN COUNTY

TO JOHN SANSPREE ..... Defendant.....

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

WAYNE HOLLIS, d/b/a HOLLIS FURNITURE COMPANY ..... Plaintiff.....

versus JOHN SANSPREE ..... Defendant.....

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

KUEHMANN FOODS, INC.

has been named as Garnishee.....

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

day of March ..... 1966

64-3-28-66

419

*Alice J. Smith*

Clerk of the Circuit Court.

6588 1/2

Given 24 day of March 1866  
on 28 day of March 1866

Received a copy of the within Petition  
John Sanspree

Service on John Sanspree

TAYLOR WILKINS, Sheriff  
By J. M. Eastman  
Deputy Sheriff

Sheriff claims 72  
Ten Cents per mile 7 1/2  
TAYLOR WILKINS, Sheriff  
BY J. M. Eastman  
DEPUTY SHERIFF

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO

WAYNE HOLLIS, d/b/a HOLLIS  
FURNITURE COMPANY

Plaintiff.....

VS.

JOHN SANSFREE

Defendant.....

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 JANUARY Term

of the Circuit Court of Baldwin County, to-wit: on the \_\_\_\_\_ day of March

1966, WAYNE HOLLIS, d/b/a HOLLIS FURNITURE COMPANY

recovered a judgment against JOHN SANSPREE

\_\_\_\_\_ for the sum of

SIX HUNDRED FIFTY-NINE & 90/100 (\$659.90) - - - - - Dollars

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

KUEHMANN FOODS, INC., 1228 Oakwood AVENUE, Toledo, Ohio

supposed to be indebted to or have effects of the said JOHN SANSPREE

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

Garnishment against said JOHN SANSPREE

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 2<sup>nd</sup>

day of March A. D. 19 66

Alice J. Duck  
Clerk.

Forest A. Christian  
FOREST A. CHRISTIAN

WAYNE HOLLIS, d/b/a HOLLIS  
FURNITURE CO.,

Plaintiff,

-vs-

JOHN S. SANSPREE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Personally appeared before me, C. G. Chason, a Notary Public in and for Baldwin County, State of Alabama, E. G. Bremford, who is known to me and who after being by me first duly and legally sworn deposes and says under oath as follows: That his name is E. G. Bremford; that he is Vice-President of Kuchmann Foods, Inc. a corporation, who is the garnishee in the above styled cause and as such Vice-President is in charge of the farming operation of Kuchmann Foods; that he is authorized to make answer in garnishment and in answer in the above styled cause shows that John Sanspree was employed without contract on the farm of Kuchmann Foods in Baldwin County, Alabama, but that as of the time of service of this garnishment, he was ill and at this time is confined in the hospital and that Kuchmann Foods was not indebted to the said John S. Sanspree at the time of service of garnishment or at any time intervening between the service of garnishment and at present time by any contract or now existing and with the further employment of the said John S. Sanspree being uncertain due to his physical condition that the said Kuchmann Foods will not be liable to the said defendant for the delivery of personal property nor for the payment of money and that in the event of further employment which would be on a day labor basis and not in the form of a continuing contract and that Kuchmann Foods does not have in its possession or under its control money or assets belonging to the defendant.

KUCHMANN FOODS, INC., a corporation.

BY: E. G. Bremford  
Vice-President

Sworn to and subscribed before me on  
this the 15 day of June, 1966.

C. G. Chason  
Notary Public, Baldwin County  
State of Alabama

C. G. C.

Filed 6-20-66  
Leif J. Douch  
clerk