

JOSEPH M. POWERS
ATTORNEY AT LAW
POST OFFICE BOX 275
617 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA
HEMLOCK 2-8781
February 3, 1959

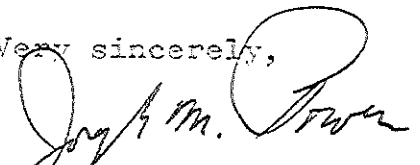
3759

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

Dear Mrs. Duck:

Would you please advise me when service has been effected on
this complaint?

Very sincerely,


Joseph M. Powers

JP:tb

WARREN L. FINCH

Plaintiff

VS

LOUIS CARNLEY

Defendant

IN THE

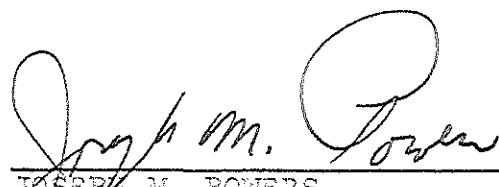
CIRCUIT COURT

OF

BALWIN COUNTY, ALABAMA

CASE NO. 3759

The Plaintiff claims of the Defendant the sum of ONE HUNDRED and no/hundreds (\$100.00) DOLLARS, due from him by promissory note payable to the Plaintiff on demand and signed by the Defendant on the 12th day of February, 1957. And the Plaintiff avers that demand was made in writing on this note but that the note remains unpaid. The Plaintiff further claims of the Defendant the sum of SIXTEEN and no/hundreds (\$16.00) DOLLARS interest as provided for in said note. And the Plaintiff further claims of the Defendant the sum of THIRTY-EIGHT and no/hundreds (\$38.00) DOLLARS, a reasonable attorney's fee as provided for in said note. And the Plaintiff further claims the benefit of a Waiver of Exemptions under the constitution and laws of Alabama. All for which the Plaintiff sues.


JOSEPH M. POWERS

ATTORNEY FOR THE PLAINTIFF

Defendant may be served at 32 Morphy Avenue, Fairhope, Alabama.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Louis Carnley

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-----

Louis Carnley-----, Defendant---

by Warren L. Finch-----

-----, Plaintiff---

Witness my hand this 5th-----day of February-----19--59

Alice F. Black-----, Clerk

RECORDED

No. 3759 Page

The State of Alabama

Baldwin County

CIRCUIT COURT

WARREN L. FINCH

Plaintiffs

vs.

LOUIS CARNLEY

Defendants

Summons and Complaint

Filed 2-5-59 19

Alice J. Duck Clerk

Joseph M. Power

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Feb 5 19 59

Sheriff

I have executed this summons

this 16, Feb 19 59

by leaving a copy with

Louis Carnley

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY

Chas. Wilkins
DEPUTY SHERIFF

Jayson Wilkins Sheriff

Lo. L. Duck Deputy Sheriff

Jack Hope

SULLIVAN & CAMERON

ATTORNEYS AT LAW

SUITE 617 FIRST NATIONAL BANK BUILDING

POST OFFICE BOX 275

MOBILE, ALABAMA

JOSEPH C. SULLIVAN
ALLAN R. CAMERON

JOSEPH M. POWERS

May
7th
1959

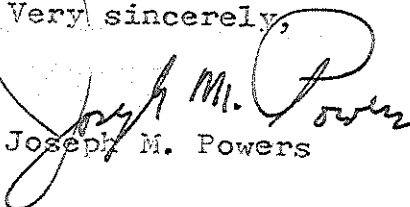
Mrs. Alice Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

In re: Finch Vs. Carnley

Dear Mrs. Duck:

I am enclosing herewith a garnishment against the Defendant in this case and I would be indebted to you if you would ask the Sheriff to send this promptly to the Sheriff of Mobile County to be served on the Rev. Bernard McKenna at Corpus Christi Church, Quincy Road, Route 5, Mobile, Alabama. This man is going to finish his job some time in the next week and I would like to get this garnishment served on Father McKenna before he pays the Defendant off.

Very sincerely,


Joseph M. Powers

J
M
P
/tb

Enclosure

SULLIVAN & CAMERON

ATTORNEYS AT LAW

SUITE 617 FIRST NATIONAL BANK BUILDING

POST OFFICE BOX 275

MOBILE, ALABAMA

JOSEPH C. SULLIVAN
ALLAN R. CAMERON
JOSEPH M. POWERS

May
19th
1959

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

In re: Finch Vs. Carnley

Dear Mrs. Duck:

I am enclosing herewith a garnishment against the Defendant in the above styled case and I would appreciate it very much if you would ask the Sheriff to send this promptly to the Sheriff of Mobile County to be served on the First Baptist Church of Plateau. The reason I ask for promptness on this is that this man changes jobs quite often and it is necessary to get it served before he leaves this job too.

Please see what you can do about this matter.

Very sincerely,

Joseph M. Powers
Joseph M. Powers *JP*

J
M
P
/tb

Enclosure

CIRCUIT COURT OF BALDWIN COUNTY
~~INFERIOR CIVIL COURT OF MOBILE~~

THE STATE OF ALABAMA,
 MOBILE County
 BALDWIN

NOTICE TO DEFENDANT

..... **Warren L. Finch**
 Plaintiff

..... **Louis Carnley**
 Defendant

..... **Rev. Bernard A. McKenna**

Judgment - - - -	\$.....
Interest - - - -	\$.....
Costs of Judgment -	\$.....
Costs of Garnishment	\$.....
Total - - - -	\$.....

Garnishees.

Take notice that I have this day issued a Writ of Garnishment, summoning
, **Rev. Bernard A. McKenna**

to appear before the Inferior Civil Court of Mobile, on the.....day of....., 195.....
 at 2 o'clock P.M., to answer on oath as Garnishee, whether they were indebted to you or not.

Given under my hand and seal, this 2 day of May, 1959.

Alfred D. [Signature]
 Clerk of the Inferior Civil Court of Mobile
 Circuit Court of Baldwin County

cd
373 375 1/2 256

Baldwin Co

Attorney for Plaintiff:—

JOSEPH M. POWERS

NOTICE TO DEFENDANT

Warren L. Finch Plaintiff

VS. CASE No. 3759

Louis Carnley Defendant

Rev. Bernard A. McKenna
Garnishees

Judgement..... \$.....

Cost \$.....

Garnishment \$.....

F A L D

MAY 8 1959

ALICE J. DUCK, (Clerk)

THE STATE OF ALABAMA
County of ~~Mobile~~
BALDWIN

Baldwin
To the Sheriff of ~~Mobile~~ County—Greetings:

You Are Commanded To Summon Rev. Bernard A. McKenna

Circuit Court of Baldwin County Baldwin
to be and appear before the ~~Interior Civil Court of Mobile~~ XXXX, at the Courthouse of ~~Mobile~~ County on
the.....day of....., 195....., at the hour of 2 P. M., to answer an oath as
Garnishee whether or not he is.....indebted to

Louis Carnley

at the time of the service of this Garnishment, or at the time of making said answer, or at any time
intervening the service of this Garnishment and making the answer, or whether he
will be indebted in future to said Louis Carnley.....by a
contract existing at the time of the serving of this Garnishment, or at the time of making the ans-
wer, and if indebted, what amount, and whether he has ~~xxx~~ have in his
possession or under his.....control any personal or real property or things in
action belonging to said Louis Carnley

Herein fail not, and have you then and there this Writ, with your actions and doing thereon.

Witness my hand and seal, this 8 day of May A. D. 195 9

Alice J. Luck Clerk (Seal)
~~Ex Officio Clerk of the Interior Civil Court of Mobile.~~

256

Attorney for Plaintiff:—

JOSEPH M. POWERS

No. 3759 1/2

Ret. Baldwin & Co., 195

Warren L. Finch

Plaintiff

vs.

Louis Carnley

Defendant

Rev. Bernard A. McKenna

Garnishee

Claim - - - - \$

Cost - - - - \$

Total - - - - \$

1/2 Corpus Christi Church
Quincy Road, Rt. 5

FILED

4/25 PM

MAY 8 1959

ALICE J. DUCK, Clerk

CIRCUIT COURT OF BALDWIN COUNTY
~~INFERIOR CIVIL COURT OF MOBILE~~

THE STATE OF ALABAMA, }

~~Mobile~~ County
 Baldwin

NOTICE TO DEFENDANT

Warren L. Finch

Plaintiff

Louis Carnley

Defendant

The First Baptist Church

of Plateau

Judgment - - - - \$.....

Interest - - - - \$.....

Costs of Judgment - \$.....

Costs of Garnishment \$.....

Total - - - - \$.....

Garnishees.

Take notice that I have this day issued a Writ of Garnishment, summoning

The First Baptist Church of Plateau

to appear before the ~~Inferior Civil Court~~ *Circuit Court of Baldwin Co* of Mobile, on the.....day of....., 195.....

at 2 o'clock P.M., to answer on oath as Garnishee, whether they were indebted to you or not.

Given under my hand and seal, this 22 day of May, 1959

George J. Herrell
 Ex-officio Clerk of the Inferior Civil Court of Mobile
 Circuit Court of Baldwin County

315

Attorney for Plaintiff:— JOSEPH M. POWERS

Baldwin Co

NOTICE TO DEFENDANT

Warren L. Finch

Plaintiff

VS. CASE No. 3759 ^{1/2}

Louis Carnley

Defendant

The First Baptist Church of Plateau

Garnishees

Judgement..... \$.....

Cost \$.....

Garnishment \$.....

FILED

MAY 22 1899

ALICE I. DUCK, CLERK
DUCK, REGISTER

THE STATE OF ALABAMA

County of Mobile
BALDWINTo the Sheriff of Baldwin County
~~To the Sheriff of Mobile County~~ Greetings:You Are Commanded To Summon..... The First Baptist Church of Plateau.....

.....
 to be and appear before the Circuit Court of Baldwin County Baldwin
~~Interior Civil Court of Mobile~~ at the Courthouse of Mobile County on
 the..... day of....., 195....., at the hour of 2 P. M., to answer an oath as
 Garnishee whether or not it is..... indebted to

Louis Carnley

.....
 at the time of the service of this Garnishment, or at the time of making said answer, or at any time
 intervening the service of this Garnishment and making the answer, or whether it.....
 will be indebted in future to said Louis Carnley..... by a
 contract existing at the time of the serving of this Garnishment, or at the time of making the ans-
 wer, and if indebted, what amount, and whether it has..... have in its.....
 possession or under its..... control any personal or real property or things in
 action belonging to said Louis Carnley.....

Herein fail not, and have you then and there this Writ, with your actions and doing thereon.

Witness my hand and seal, this 22 day of May..... A. D. 195 9.....

James L. Newsham (Seal)
 Ex-Officio Clerk of the Interior Civil Court of Mobile

3/5

Attorney for Plaintiff:-

JOSEPH M. POWERS

No. 3759 1/2

Ret. , 195

Baldwin Co

Warren L. Finch

Plaintiff

vs.

Louis Carnley

Defendant

The First Baptist Church of
Garnishee

Platoau

Claim - - - \$

Cost - - - \$

Total - - - \$

MAY 22

ALICE J. DUCK, CLERK
REGISTER

R. W. A. atty.
athor

THE STATE OF ALABAMA
County of Mobile
BALDWIN

To the Sheriff of Baldwin County
~~To the Sheriff of Mobile County - Greetings:~~

You Are Commanded To Summon.....The First Baptist Church of Plateau.....

.....
to be and appear before the Circuit Court of Baldwin County, Baldwin
~~Inferior Civil Court of Mobile~~, at the Courthouse of Mobile County on
the.....day of....., 195....., at the hour of 2 P. M., to answer an oath as
Garnishee whether or not it is.....indebted to

.....Louis Carnley.....
at the time of the service of this Garnishment, or at the time of making said answer, or at any time
intervening the service of this Garnishment and making the answer, or whether it.....
will be indebted in future to said Louis Carnley.....by a
contract existing at the time of the serving of this Garnishment, or at the time of making the ans-
wer, and if indebted, what amount, and whether it has.....have in its.....
possession or under its.....control any personal or real property or things in
action belonging to said Louis Carnley.....

Herein fail not, and have you then and there this Writ, with your actions and doing thereon.

Witness my hand and seal, this 22 day of May A. D. 1959

Archie L. Henry (Seal)
Archie L. Henry, Clerk of Mobile County

Cd
1609

315

Attorney for Plaintiff:-

JOSEPH M. POWERS

No. 3759 $\frac{1}{2}$

Ret. , 195

Warren L. Finch

Plaintiff

vs.

Louis Carnley

Defendant

RWA

The First Baptist Church of Plateau
Garnishee

Claim - - - - \$

Cost - - - - \$

Total - - - - \$

FILED

May 22 1959

ALICE J. DUCK, CLERK
REGISTER

Returned 6-12-59

Without Action By Order of
RAY D. BRIDGES, Sheriff

By L. Smith

THE STATE OF ALABAMA

MOBILE, COUNTY.

Notary Public

Before me, the undersigned, ~~Ex-Officio Clerk Inferior Civil Court of Mobile~~, personally appearedJoseph M. Powers

who made oath in

due form of law that Warren L. Finch

hath

obtained judgment against Louis Carnleyfor ONE HUNDRED FIFTY-FOUR and no/100 (\$154.00)

Dollars

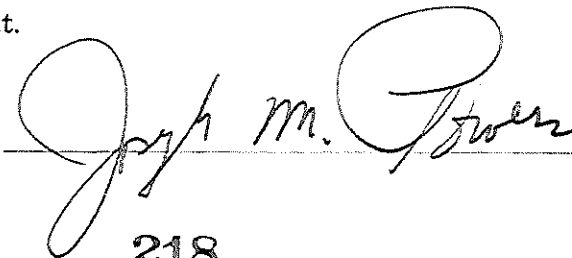
besides cost of suit before the Inferior Civil Court of Mobile, and that

The First Baptist Church of Plateau

is supposed to be indebted

to or have effects of the said Louis Carnleyin its possession, or under its control, and that I believe processof Garnishment is necessary against the said The First Baptist Church of Plateauto obtain satisfaction of this judgment.

Subscribed and sworn to before me, the

21st day of May 1959.Jan Mims (SEAL)~~Ex-Officio Clerk Inferior Civil Court of Mobile~~
Notary Public

218

JOSEPH M. POWERS
ATTORNEY FOR PLAINTIFF

No. 3759 $\frac{1}{2}$

RET.

Warren L. Finch

Plaintiff

VS.

}

GARNISHMENT

Louis Carnley

Defendant

First Baptist Church of Plateau

Executed by Service on

Defendant

Notice of Garnishment,

This _____ day of _____ 195_____

Sheriff Mobile County

By _____

Deputy Sheriff

Executed by Service on

FILED

MAY 22 - 1957

ALICE J. DUCK,

CLERK

REGISTRAR

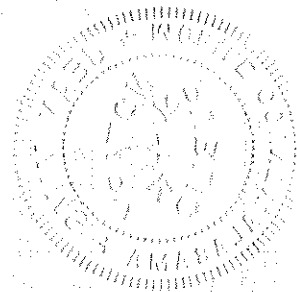
Garnishee

This _____ day of _____ 195_____

Sheriff Mobile County

By _____

Deputy Sheriff



THE STATE OF ALABAMA

MOBILE COUNTY.

Notary Public

Before me, the undersigned, ~~Ex-Officio Clerk Inferior Civil Court of Mobile~~, personally appearedJoseph M. Powers

who made oath in

due form of law that Warren L. Finch

hath

obtained judgment against Louis Carnleyfor ONE HUNDRED FIFTY-FOUR (\$154.00)

Dollars

besides cost of suit before the ~~Inferior Civil Court of Mobile~~ Circuit Court of Baldwin County, and thatRev. Bernard A. McKenna

is

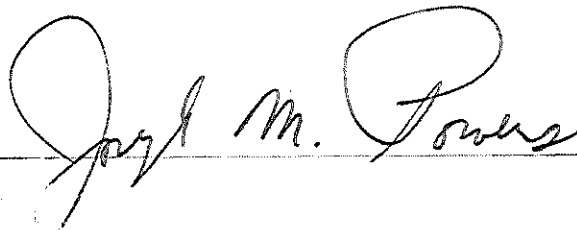
supposed to be indebted

to or have effects of the said Louis Carnleyin his possession, or under his control, and that I believe processof Garnishment is necessary against the said Rev. Bernard A. McKennato obtain satisfaction of this judgment.

Subscribed and sworn to before me, the

7th day ofMay 195⁹

Notary Public

~~Ex-Officio Clerk Inferior Civil Court of Mobile~~

JOSEPH M. POWERS
ATTORNEY FOR PLAINTIFF

No 3759

RET.

Warren L. Finch

Plaintiff

VS. } GARNISHMENT

Louis Carnley

Defendant

Rev. Bernard A. McKenna

Executed by Service on

Defendant

Notice of Garnishment,

This _____ day of _____ 195_____

Sheriff Mobile County

By _____

Deputy Sheriff

Executed by Service on

Garnishee

This _____ day of _____ 195_____

Sheriff Mobile County

By _____

FINED

Deputy Sheriff

MAY 18 1959

ALICE J. DUCK, Clerk

CIRCUIT COURT OF BALDWIN COUNTY
INFERIOR CIVIL COURT OF MOBILE

THE STATE OF ALABAMA, }

Mobile County
 Baldwin

NOTICE TO DEFENDANT

Warren L. Finch

Plaintiff

Louis Carnley

Defendant

The First Baptist Church

of Plateau

Judgment - - - - \$.....
 Interest - - - - \$.....
 Costs of Judgment - \$.....
 Costs of Garnishment \$.....
 Total - - - - \$.....

Garnishees.

Take notice that I have this day issued a Writ of Garnishment, summoning

The First Baptist Church of Plateau

to appear before the Circuit Court of Baldwin County on the.....day of....., 195.....

at 2 o'clock P.M., to answer on oath as Garnishee, whether they were indebted to you or not.

Given under my hand and seal, this 22 day of....., 1959.

Rebecca L. Russell
 Ex-officio Clerk of the Circuit Court of Baldwin County

Attorney for Plaintiff:— JOSEPH M. POWERS

NOTICE TO DEFENDANT

Warren L. Finch

Plaintiff

VS. CASE No. 3759

Louis Carnley

Defendant

The First Baptist Church of Plateau

Garnishees

Judgement..... \$.....

Cost \$.....

Garnishment \$.....

FILED

MAY 22 1959

ALICE J. DUCK, CLERK
REGISTER

Returned 6-12-59
Without Action By Order of Ray
RAY D. BRIDGES, Sheriff atty
By L. Smith D. S.

CIRCUIT COURT OF BALDWIN COUNTY
INFERIOR CIVIL COURT OF MOBILE

THE STATE OF ALABAMA,
 Mobile County
 BALDWIN

NOTICE TO DEFENDANT

Warren L. Finch
 Plaintiff
 Louis Carnley
 Defendant
 Rev. Bernard A. McKenna

Judgment - - - - \$.....
 Interest - - - - \$.....
 Costs of Judgment - \$.....
 Costs of Garnishment \$.....
 Total - - - - \$.....
 Garnishees.

Take notice that I have this day issued a Writ of Garnishment, summoning
 Rev, Bernard A. McKenna
 to appear before the Inferior Civil Court of Mobile, on the.....day of....., 195.....
 at 2 o'clock P.M., to answer on oath as Garnishee, whether they were indebted to you or not.

Given under my hand and seal, this 8 day of May, 1959

W. J. Duck
 Ex-officio Clerk of the Inferior Civil Court of Mobile
 Circuit Court of Baldwin County

1873 3759 1/2

Attorney for Plaintiff:—

JOSEPH M. POWERS

NOTICE TO DEFENDANT

Warren L. Finch

Plaintiff

VS. CASE No. 3759

Louis Carnley

Defendant

Rev. Bernard A. McKenna

Garnishees

Judgement..... \$.....

Cost \$.....

Garnishment \$.....

Returned 5-25-59
Without Action By Order of Pliff City
RAY D. BRIDGES, Sheriff
By B. Harris D. S.

F A L

MAY 8 1959

ALICE J. DUCK, Clerk

THE STATE OF ALABAMA
County of ~~MOBILE~~
BALDWIN

Baldwin
To the Sheriff of ~~Mobile~~ County—Greetings:

You Are Commanded To Summon..... Rev. Bernard A. McKenna.....

..... Circuit Court of Baldwin County Baldwin
to be and appear before the ~~Interior Civil Court of Mobile~~, at the Courthouse of ~~MOBILE~~ County on
the..... day of....., 195....., at the hour of 2 P. M., to answer an oath as
Garnishee whether or not..... he is..... indebted to

..... Louis Carnley.....
at the time of the service of this Garnishment, or at the time of making said answer, or at any time
intervening the service of this Garnishment and making the answer, or whether..... he.....
will be indebted in future to said..... Louis Carnley..... by a
contract existing at the time of the serving of this Garnishment, or at the time of making the ans-
wer, and if indebted, what amount, and whether..... he has..... ~~have~~ in his.....
possession or under..... his..... control any personal or real property or things in
action belonging to said..... Louis Carnley.....

Herein fail not, and have you then and there this Writ, with your actions and doing thereon.

Witness my hand and seal, this 8th day of May..... A. D. 1959.....

Alice J. Luck, Clerk..... (Seal)

Ex-Officio Clerk of the Interior Civil Court of Mobile

cd 1513

256

Attorney for Plaintiff:-

JOSEPH M. POWERS

No. 3759 1/2

Ret. _____, 195

Warren E. Finch
Plaintiff

vs.

Louis Carnley
Defendant

Rev. Bernard A. McKenna
Garnishee

Claim - - - - \$
Cost - - - - \$
Total - - - - \$

RW: M.

FILED

MAY 8 1959

ALICE J. DUCK, (Clerk)

Returned 5-25-59
Without Action By Order of Pctt/ctty
RAY D. BRIDGES, Sheriff
By B. Harris D. S.