

3542

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon T. A. McKenzie and Margaret McKenzie to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by S. B. Adams Lumber Company, Inc., a corporation, as Complainant, against T. A. McKenzie and Margaret McKenzie, as Respondents.

Witness my hand this 10<sup>th</sup> day of May, 1955.

Archie H. Hester  
Register.

S. B. ADAMS LUMBER CO., INC., )  
a corporation, )  
Complainant, )  
vs. )  
T. A. MCKENZIE and )  
MARGARET MCKENZIE, )  
Respondents. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY,  
AND TO THE HONORABLE HUBERT M. HALL, JUDGE THEREOF:

Comes now the Complainant, S. B. Adams Lumber Company, Inc., a corporation, by its solicitors, and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:

FIRST

That the Complainant is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Mobile, Alabama, and that it has been engaged and is now engaged in the business of selling lumber and timber. That the respondents are both over the age of twenty-one years and reside at or near Fairhope, Alabama, in Baldwin County.

## SECOND

That during the months of, to-wit, October, November and December, 1954, the Respondents purchased certain lumber from the Complainant, a detailed description of which is contained in the verified statement of account which is attached hereto and marked "Exhibit A", and by reference made a part hereof, the last item of which material was furnished on December 28, 1954, on which date the entire indebtedness for said lumber matured. Your Complainant further alleges that it did at the request of the Respondents deliver said lumber to them and they accepted the same and that although it has made consistent and repeated demands for the payment to it of the sum of Two Thousand Fifty-seven Dollars and Ninety-four Cents (\$2057.94), which sum is the total price of the lumber purchased by the Respondents from the Complainant, including State of Alabama sales tax, that the Respondents have refused and continue to refuse to pay to the Complainant the purchase price of the said lumber. That there is attached hereto and marked "Exhibit A" and by reference made a part hereof, an itemized verified statement of the indebtedness herein sued upon and that although the Complainant has complied in all respects with its agreement with the Respondents, they have refused to pay the sum shown on said statement and agreed to by them.

## THIRD

That your Complainant was the original contractor for the furnishing of the material referred to above and that as such it has filed a statement of lien, a copy of which is attached hereto and marked "Exhibit B", and by reference made a part hereof as though fully incorporated herein, for record in the office of the Judge of Probate of Baldwin County, Alabama, on May 25, 1955, which instrument is recorded in Book \_\_\_\_\_ of Exemptions & Liens at pages \_\_\_\_\_, and it was filed within six (6) months after the maturity of the entire indebtedness due from the Respondents to the Complainant and within six (6) months after the last item of material was furnished by the Complainant to the Respondents. That all of the materials referred to above were sold to and delivered to the

Respondents at their request and that said materials are located in the frame dwelling house located on and upon the following described real property which is owned by the Respondent Margaret McKenzie and which is situated in Baldwin County, to-wit:

The East fourteen (14) acres of the Southeast Quarter of the Southwest Quarter of Section 11, Township 7 South, Range 2 East.

#### FOURTH

The Complainant claims of the Respondents Two Thousand and Fifty-seven and Ninety-four One-hundredths Dollars (\$2057.94) due from them by account on the twenty-eighth (28) day of December, 1954, which sum of money, together with the interest thereon, is still unpaid.

#### FIFTH

The Complainant claims of the Respondents Two Thousand Fifty-seven Dollars and Ninety-four Cents for merchandise, goods, and chattels sold by the Complainant to the Respondents during the months of, to-wit, October, November, and December, 1954, which sum of money, with the interest thereon from December 28, 1954, is still unpaid.

#### PRAYER FOR PROCESS

The premises considered, your Complainant prays that the Respondents T. A. McKenzie and Margaret McKenzie be made party respondents to this proceeding and that they be required to appear and plead, answer and demur to this Bill of Complaint within the time allowed by law and the rules of this Honorable Court.

#### PRAYER FOR RELIEF

The Complainant prays that this Court will, on a final hearing of this cause, enter an appropriate order or decree ascertaining and fixing the amount due by the Respondents, or either of them, to the Complainant for or on account of the sale by the Complainant to said Respondents of the goods and materials noted above and will render a decree against the Respondents, or either of them, and in favor of the Complainant for said amount. Your Complainant further prays that this Court will fix and establish a lien on the frame dwelling house located on and upon the above described property to

STATE OF ALABAMA )

COUNTY OF BALDWIN )

S. B. ADAMS LUMBER COMPANY, INC., a corporation, files this statement in writing, verified by the oath of W. C. ADAMS, who has personal knowledge of the facts herein set forth;

That said S. B. Adams Lumber Company, Inc., a corporation, claims a lien upon the following property situated in the County of Baldwin, State of Alabama, and more particularly described as follows, to-wit:

The frame dwelling house located on and upon the East Fourteen (14) acres of the Southeast Quarter of the Southwest Quarter, Section 11, Township 7 South, Range 2 East, Baldwin County, Alabama.

This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of \$2057.94 with interest from, to-wit, the 28th day of December, 1954, being the balance due for supplies and materials furnished by the undersigned S. B. Adams Lumber Company, Inc., a corporation, to the owners of said premises and used by said owners in the erection and construction of improvements on said property.

The names of the owners or proprietors of the said property are believed to be T. A. McKenzie and Margaret McKenzie, his wife.

S. B. ADAMS LUMBER COMPANY, INC.,  
A Corporation

By W. C. Adams (signed)  
As its Vice-President

STATE OF ALABAMA )  
COUNTY OF MOBILE )

Before me, Estelle P. Suess (signed), a Notary Public in and for the County of Mobile, State of Alabama, personally appeared W. C. Adams, who being duly sworn, doth depose and say: That he has personal knowledge of the facts set forth in the foregoing statement of lien, and that the same are true and correct to the best of his knowledge and belief.

W. C. Adams (signed)  
W. C. Adams

Subscribed and sworn to before me  
on this 24th day of May, 1955.

Estelle P. Suess (signed)  
Notary Public, Mobile County, Ala.

S. B. ADAMS LUMBER COMPANY,  
INC., a corporation,

Complainant,

vs.

T. A. MCKENZIE and MARGARET  
MCKENZIE,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
NO. 3542

NOTICE OF SALE

NOTICE IS HEREBY GIVEN that under and pursuant to the Final Decree dated October 15, 1956, and the Order of Sale dated January 8, 1957, in the above styled cause that I will sell the following described real property situated in Baldwin County, Alabama, together with the improvements located thereon, at public outcry, for cash to the highest bidder, on February 1, 1957, at 11:00 o'clock A. M., at the front door of the Courthouse in Bay Minette, Baldwin County, Alabama.

The description of the property which will be sold at said time and place is as follows:

The frame dwelling house situated on the East Fourteen (14) acres of the Southeast Quarter of the Southwest Quarter (SE $\frac{1}{4}$  of SW $\frac{1}{4}$ ) of Section Eleven (11), Township Seven (7) South, Range Two (2) East, together with the One (1) acre of land on which said house is located and which is described as being the One (1) acre of land, measuring 208.56 feet by 208.56 feet, in the middle of which said house is located.

The purpose of this sale is for the satisfaction of a Materialman's Lien owned on said property by the Complainant.

Done this \_\_\_\_ day of January, 1957.

\_\_\_\_\_  
Alice J. Duck, Register

CHASON & STONE

Solicitors for Complainant

S. B. ADAMS LUMBER COMPANY, INC.,  
a Corporation,

Complainant,

vs.

T. A. McKENZIE and  
MARGARET McKENZIE,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY. NO. 3542

DECREE OVERRULING DEMURRER OF RESPONDENTS

This cause coming on to be heard was submitted upon the Bill of Complaint and the demurrer thereto, and the Court having considered the same is of the opinion that the demurrer is not well taken and should be overruled.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that the demurrer of the Respondents to the Bill of Complaint heretofore filed in this cause be and the same hereby is overruled and the Respondents are hereby given 30 days from the date hereof in which to file further pleadings.

Done this 17th day of January, 1956.

Hubert M. Hall  
Circuit Judge.

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
NO. 3542

# ORDER OF SALE

It having been made to appear to the Court that more than thirty (30) days have elapsed since the date of the final decree heretofore rendered in this cause on October 15, 1956, in and by which terms a lien was declared and established in favor of the Complainant on the following described property in Baldwin County, Alabama, to-wit:

The frame dwelling house situated on the East Fourteen (14) acres of the Southeast Quarter of the Southwest Quarter (SE $\frac{1}{4}$  of SW $\frac{1}{4}$ ) of Section Eleven (11), Township Seven (7) South, Range Two (2) East, together with the One (1) acre of land on which said house is located and which is described as being the One (1) acre of land, measuring 208.56 feet by 208.56 feet, in the middle of which said house is located.

and that the amount therein declared to be due from the Respondents to the Complainant has not been paid in satisfaction of said lien; it is therefore

ORDERED, ADJUDGED and DECREED by the Court that the Register of this Court sell the above described property and the improvements located thereon at public outcry for cash, to the highest bidder, during the legal hours of sale after first having given notice of the date, time and place of said sale by publication once a week for three successive weeks in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama.

Done this \_\_\_\_ day of January, 1957.

**Judge**

S. B. ADAMS LUMBER COMPANY,  
INC., a Corporation,

Complainant,

vs.

T. A. McKENZIE and MARGARET  
McKENZIE,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

FINAL DECREE

This cause coming on to be heard was submitted for final decree on behalf of the Complainant on the Bill of Complaint, Decree Overruling Demurrer to the complaint, Motion for Decree Pro Confesso on Personal Service, Decree Pro Confesso on Personal Service and the testimony of W. C. Adams, Vice President of Complainant Corporation and the Court having considered the same is of the opinion that the Complainant is entitled to the relief prayed for in the Bill of Complaint; it is, therefore,

ORDERED, ADJUDGED and DECREED by the Circuit Court of Baldwin County, Alabama, in Equity, that the Complainant, S. B. Adams Lumber Company, a corporation, have and recover from the Respondents, T. A. McKenzie and Margaret McKenzie, the sum of Two Thousand and Two Hundred Eighty Dollars and Seventy-three cents (\$2,280.73).

It is further ORDERED, ADJUDGED and DECREED by the Court that a lien be, and the same is hereby declared and established in favor of the Complainant, for the materials furnished by the Complainant to the Respondent upon the frame dwelling house which is owned by the Respondents and in which said materials were used and which is situated on the following described real property in Baldwin County Alabama, to-wit:

The East Fourteen (14) acres of the Southeast Quarter of the Southwest Quarter (SE $\frac{1}{4}$  of SW $\frac{1}{4}$ ) of Section Eleven (11), Township Seven (7) South, Range Two (2) East

and that said dwelling house be sold <sup>for</sup> ~~and~~ the satisfaction of this judgment and of said lien hereby established, and for which sale let the proper order of sale be issued, unless within thirty (30) days from the date hereof the amount herein decreed to be due shall be



paid.

It is further ORDERED, ADJUDGED and DECREED by the Court that the Respondents pay the cost of this proceeding for which let execution issue.

Done at Bay Minette, Baldwin County, Alabama, this the 15 day of October, 1956.

Hubert M. Hall  
Judge

S. B. ADAMS LUMBER COMPANY, INC.,  
A Corporation,

Complainant,

vs.

T. A. McKENZIE and MARGARET  
McKENZIE,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


IN EQUITY No. 3542

DECREE PRO CONFESSO

This cause coming on to be heard and it appearing to the Court that a motion for a decree pro confesso was heretofore filed in this cause on February 24, 1956, and that said cause admits, in all respects, of the rendition of a decree pro confesso in favor of the Complainant and against the Respondents; it is, therefore,

ORDERED, ADJUDGED and DECREED by the Circuit Court of Baldwin County, Alabama, In Equity, on motion of the Complainant acting by and through its Solicitors, that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against T. A. McKenzie and Margaret McKenzie, the Respondents.

Done this 9th day of October, 1956.

  
Register

S. B. ADAMS LUMBER COMPANY,  
INC., a Corporation,

Complainant,

vs.

T. A. McKENZIE and  
MARGARET McKENZIE,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY. NO. 3542

MOTION FOR DECREE PRO CONFESSO

Comes now the Complainant in the above styled cause by its solicitors and moves this Honorable Court to enter a decree Pro Confesso against the Respondents and as grounds for said motion shows unto this Court as follows:

That this Court did on, heretofore to-wit: January 17, 1956, enter an order for a decree overruling the demurrer of the Respondents to the Bill of Complaint and that in and by the terms of said decree the Court granted the Respondents thirty (30) days from the date thereof in which to file further pleadings and that more than thirty (30) days have elapsed since the rendition of said decree and the Respondents have failed to comply with the terms of the same.

Respectfully submitted,

CHASON & STONE

*Filed Feb 24, 1956*  
*Alice J. Luck*  
*Register*

By: *Marlene S. Stone*

S. B. ADAMS LUMBER COMPANY, INC.,  
a Corporation,

Complainant,

VS.

T. A. McKENZIE and MARGARET  
McKENZIE,

Respondents.


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 3542

WITHDRAWAL OF APPEARANCE

Now comes James R. Owen, Solicitor for the Respondents  
in the above styled cause and withdraws his appearance therefrom.

  
Solicitor for Respondents.

*filed Feb. 23, 1956*  
*Bliss J. Luck, Clerk*

WITHDRAWAL OF APPEARANCE

S. B. ADAMS LUMBER COMPANY, INC.  
a Corporation,

Complainant,

VS.

T. A. McKENZIE and MARGARET  
McKENZIE,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 3542

FILED  
FEB 23 1956  
ALICE J. DICK, Register

S. B. ADAMS LUMBER COMPANY, INC.,  
a Corporation,

Complainant,

VS.

T. A. McKENZIE and MARGARET  
McKenzie,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY NO. 3542

DEMURRER

Now come the Respondents in the above styled cause and demur to the Bill of Complaint heretofore filed in this cause and to each count thereof, and as grounds for said demurrer assigns the following separately and severally:

1. There is no equity in the bill.
2. The Complaint refers to an attached Exhibit "A" to the Bill of Complaint, but there is no Exhibit "A" attached thereto.

  
Solicitor for Respondents.

*Filed July 1, 1955*  
*Alice J. Duck, Register*

3542

DEMURRER

S. B. ADAMS LUMBER COMPANY, INC.  
a Corporation,

Complainant,

VS.

T. A. MCKENZIE AND MARGARET  
MCKENZIE,

Respondents.

FILED

JUL 7 1955

ALICE J. DUCK, Register

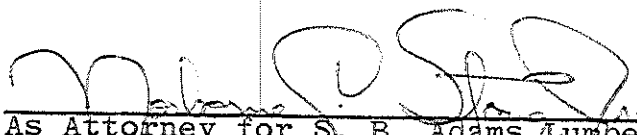
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 3542

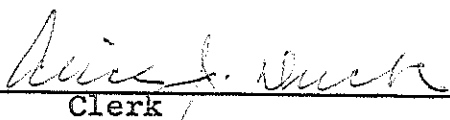
STATE OF ALABAMA  
BALDWIN COUNTY

*S. B. Adams Lumber Co.  
vs  
T. A. McKenzie + Margaret McKenzie*

Personally appeared before me Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid Norborne C. Stone, Jr., as Attorney, who being duly sworn, on oath says, that a regular October Term of the Circuit Court of Baldwin County, to-wit: on the 15th day of October, 1956, S. B. Adams Lumber Company, Inc., a corporation recovered a judgment against T. A. McKenzie and Margaret McKenzie for the sum of Two Thousand Two Hundred and Eighty and 73/100 Dollars (\$2,280.73), besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect; that Alabama Dry Dock & Shipbuilding Company, a corporation, supposed to be indebted to or have effects of the said T. A. McKenzie in its possession, or under its control, and that he believes process of Garnishment against said Alabama Dry Dock & Shipbuilding Company is necessary to obtain satisfaction of said Judgment.

  
As Attorney for S. B. Adams Lumber  
Company, Inc., a corporation

Sworn to and subscribed before me  
on this the 21 day of March, 1958.

  
Clerk



S. B. ADAMS LUMBER COMPANY,	X	
	X	
Complainant,	X	IN THE CIRCUIT COURT OF
	X	
versus	X	BALDWIN COUNTY, ALABAMA
	X	
T. A. MCKENZIE, et al.,	X	IN EQUITY NO: 3542½
	X	
Respondents.	X	

ORDER RELEASING WRIT OF GARNISHMENT

This cause coming on to be heard now comes the Complainant by its Solicitors of Record in open court and moves the Court to dismiss the Writ of Garnishment heretofore issued by the Register of this Court on March 21, 1958, directed to Alabama Dry Dock & Shipbuilding Company, Garnishee; and the Court having considered the same is of the opinion that the motion should be granted; it is, therefore

ORDERED, ADJUDGED and DECREED by the Circuit Court of Baldwin County, Alabama, In Equity, that the Writ of Garnishment issued in this cause on March 21, 1958, directed to Alabama Dry Dock & Shipbuilding Company, Garnishee, be, and the same is hereby, dismissed.

DONE this the 13 day of May, 1959.

*J. Hubert M. Starn*  
Circuit Judge

112

filed 5-13-59  
Wichita  
Kia

NOTICE TO DEFENDANT OF GARNISHMENT

BT-1-42-300

STATE OF ALABAMA,  
BALDWIN COUNTY }

TO T. A. McKenzie and Margaret McKenzie, Defendants :

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

S. B. Adams Lumber Company, Inc., a corporation, Plaintiff .....

versus T. A. McKenzie and Margaret McKenzie, Defendant .....

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

Dry Dock & Shipbuilding Company, a corporation, .....

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 21 .....

day of March, 1948

Reece J. Alcock  
Clerk of the Circuit Court.

3542/12

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Plaintiff .....

VS.

Defendant.....

NOTICE TO DEFENDANT OF GARNISHMENT

BT-1-42-300

STATE OF ALABAMA,  
BALDWIN COUNTY }

TO T. A. McKenzie and Margaret McKenzie....., Defendants:

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

S. B. Adams Lumber Company, Inc., a corporation....., Plaintiff.....,

versus T. A. McKenzie and Margaret McKenzie....., Defendant.....,

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

Dry Dock & Shipbuilding Company, a corporation,.....

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 21.....

day of March....., 1958.....

Alice J. Newell  
Clerk of the Circuit Court.

received 21 day of Nov 1958  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
served a copy of the within Notice  
on J. H. McFarland  
Margaret McFarland  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

*Returned Defts  
Not found  
in this county*

3547 1/2  
NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

*S. B. Adams*

Plaintiff .....

VS.

Defendant.....

Equity ✓ 404  
994 Co #3  
Circuit Court, Baldwin County

No. 3542-14

J. B. Adams Lumber Co

VS. { Garnishment On Judgment  
J. B. Mc Kenzie  
Margaret Mc Kenzie

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

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

Ala.  
25X  
ad

Attorney

Printed by Moore Ptg. Co.

Received \_\_\_\_\_ 24 Day of March 1908  
and on \_\_\_\_\_ 25 Day of March 1908  
I served a copy of the within \_\_\_\_\_  
on \_\_\_\_\_  
by service on \_\_\_\_\_  
RAY D. BRIDGES, Sheriff  
By \_\_\_\_\_ D. S.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

March

TERM, 1958

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular October Term, 1956 of the Circuit Court of Baldwin County,  
to-wit: On the 15th day of October, 1956, being a regular day of  
said term, S. B. Adams Lumber Company, Inc., a corporation

recovered judgment against T. A. McKenzie and Margaret McKenzie

for the sum of Twenty-two Hundred and Eighty and 73/100 Dollars, and cost of suit,  
and affidavit having been made by Norborne C. Stone, Jr., as attorney  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

Alabama Dry Dock & Shipbuilding Company

has or is believed to have in its possession, or under its control money  
or effects belonging to said defendant T. A. McKenzie 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 Alabama Dry Dock & Ship-  
building Company

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 third Monday in April A. D. 1958,  
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  
T. A. McKenzie 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 T. A. McKenzie

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., 1958

Issued March day of March A. D., 1958.

ATTEST:

Alice J. Duck, Clerk.



STATE OF ALABAMA:

COUNTY OF MOBILE:

S.E. Adams Lumber Company

PLAINTIFF

T.A. McKenzie

DEFENDANT

VS:

Your No. 3542;

ALABAMA DRY DOCK & SHIPBUILDING COMPANY, Garnishees:

Before the Circuit Court of Baldwin County  
~~Court of Mobile~~ in and for said County and State:

And now comes the Alabama Dry Dock and Shipbuilding Company, through and by  
H.H. Wilson its agent duly authorized by it to make  
this answer, and for answer to the garnishment in this cause says:

That at the service of this writ of garnishment and at the time of making  
its answer thereto, it is NOT indebted to said defendant in the sum of  
(refer to Note) Dollars, (\$ )

being wages, salary or compensation for personal services rendered by defendant.  
who is a resident of the State of Alabama, and that neither at the time of the  
service of said writ, nor at any time since has it been indebted to said defendant  
in any other and further sum; and that it will not be indebted in the future to  
said defendant by a contract now or previously existing; and that is not liable to  
said defendant by a contract now or previously existing 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 that it has not now  
in its possession or under its control any money or effects belonging to said de-  
fendant, and that it has not had in its possession or under its control since the  
service of said writ any money belonging to said defendant, and that it does not  
know or believe that any other person is indebted to said defendant; and that it  
does not know or believe that any other person has effects of said defendant in his  
possession or under his control.

✓ Note: The above named defendant was dropped from our payroll September 12, 1958 for failure  
to report for work when recalled. There has been no monies collected on this Garnishment due  
to a prior Garnishment that was under collection and was not completed.

And having answered said Garnishment, prays to be hence dismissed with its reasonable  
costs in his behalf expended.

ALABAMA DRY DOCK & SHIPBUILDING CO.

By H.H. Wilson Agent

Subscribed and sworn to before me, this

21st day of November 1958

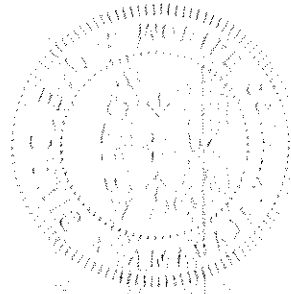
E. Davis  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

Refer to our no. 1441

278

*filed Nov. 22. 1958*

35421/2



FILED

NOV 22 1958

ALICE J. DUCK, CLERK  
REGISTER

NOTICE TO DEFENDANT OF GARNISHMENT

BT-1-42-300

STATE OF ALABAMA,  
BALDWIN COUNTY }

TO T. A. McKenzie and Margaret McKenzie, Defendants :

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

S. B. Adams Lumber Company, Inc., a corporation, Plaintiff,

versus T. A. McKenzie and Margaret McKenzie, Defendant s,

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

Dry Dock & Shipbuilding Company, a corporation,

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 21

day of March, 1948

*Reed J. Smith*  
Clerk of the Circuit Court.

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

Plaintiff .....

VS.

Defendant.....

STATE OF ALABAMA:

COUNTY OF MOBILE:

S. B. Adams Lumber Co. PLAINTIFF  
Inc., a corporation  
T. A. McKenzie DEFENDANT  
And Margaret McKenzie

Your No. 3542½

VS:

ALABAMA DRY DOCK & SHIPBUILDING COMPANY, Garnishees:

Before the Circuit Court, Baldwin County

Court of ~~MOBILE~~ in and for said County and State:

And now comes the Alabama Dry Dock and Shipbuilding Company, through and by  
H. H. Wilson, its agent duly authorized by it to make this answer,  
and for answer to the garnishment in this cause says:

~~In accordance with the new Garnishment Law we are in process of collecting  
and have not had the necessary time to accumulate a sum equal the amount shown  
as due by the court.~~

NOTE: The above named defendant has a prior garnishment # 2532½  
From your court being collected at this time.

ALABAMA DRY DOCK & SHIPBUILDING CO.

By H. H. Wilson Agent.  
H. H. Wilson

Subscribed and sworn to before me this

31 day of March 1958

Refer to our # 1441

Notary Public, Mobile County, Alabama

277

S. B. ADAMS LUMBER COMPANY,

Complainant.

versus

T. A. MCKENZIE, et al.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO: 3542½

ORDER RELEASING WRIT OF GARNISHMENT

This cause coming on to be heard now comes the Complainant by its Solicitors of Record in open court and moves the Court to dismiss the Writ of Garnishment heretofore issued by the Register of this Court on March 21, 1958, directed to Alabama Dry Dock & Shipbuilding Company, Garnishee; and the Court having considered the same is of the opinion that the motion should be granted; it is, therefore

ORDERED, ADJUDGED and DECREED by the Circuit Court of Baldwin County, Alabama, In Equity, that the Writ of Garnishment issued in this cause on March 21, 1958, directed to Alabama Dry Dock & Shipbuilding Company, Garnishee, be, and the same is hereby, dismissed.

DONE this the 13 day of May, 1959.

Robert M. J. Lee  
Circuit Judge

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MYRTLE RUTH TAYLOR

Complainant

vs.

WILLIAM LLOYD TAYLOR

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Myrtle Ruth Taylor is forever divorced from the said William Lloyd Taylor for and on account of

And it is hereby further ordered, adjudged and decreed that the said Complainant, Myrtle Ruth Taylor, shall have the care, custody and control of the two minor children, Sandra Carol Taylor and Michael Lloyd Taylor.

And it is further ordered, adjudged and decreed that the said Respondent William Lloyd Taylor, shall pay to the said Complainant the sum of \$60.00 per month as maintenance and support for said minor children, Sandra Carol Taylor and Michael Lloyd Taylor.

And it is further ordered, adjudged and decreed that the Respondent shall have reasonable rights of visitation with the said minor children, Sandra Carol Taylor and Michael Lloyd Taylor.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that Myrtle Ruth Taylor the Complainant pay the cost herein to be taxed, for which executed may issue.

This 13 day of June, 1955

*Hubert M. Hare*  
Judge Circuit Court, In Equity.

I, \_\_\_\_\_, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_  
Register of Circuit Court, In Equity.

No. 3543

Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

MYRTLE RUTH TAYLOR

Complainant

vs.

WILLIAM LLOYD TAYLOR

Respondent

**DIVORCE DECREE**

**FILED**

**JUN 13 1955**

**ALICE I. DUCK, Register**