

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

36601

AREA CODE 205

SAM W. PIPES

TEL. 432-4463

WALTER M. COOK

P.O. DRAWER 2525

GORDON B. KAHN

G. SAGE LYONS

AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

NORTON W. BROOKER, JR.

March 2, 1970

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

Re: Moore-Handley, Inc. vs William W. Chancey
Case No. 8051

Dear Mrs. Duck:

Execution against the Judgment Debtor in the above case has been returned NO PROPERTY FOUND, but we have now located assets on which the Sheriff can levy. Please prepare an alias Writ of Execution and forward it to the Sheriff for appropriate action.

Very truly yours,

LYONS, PIPES AND COOK



Augustine Meaher, III

AM/a

MOORE-HANDLEY, INC.,
a Corporation,

Plaintiff

vs

WILLIAM W. CHANCEY, INDIVIDUALLY
AND DOING BUSINESS AS ELECTRONIC
PRODUCTS

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY ALABAMA
)
) AT LAW

CASE NO 5051

COUNT ONE

Plaintiff claims of the defendant the sum of to-wit, SEVEN HUNDRED AND NO/100 (\$700.00) DOLLARS due from him by account between the defendant and Moore-Handley, Inc., a corporation, on to-wit the 14th day of April, 1967, which sum of money with the interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the defendant the sum of to-wit, SEVEN HUNDRED AND NO/100 (\$700.00) DOLLARS on account stated between the defendant and Moore-Handley, Inc., a corporation, on to-wit the 5th day of March, 1968, which sum of money with the interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the defendant the sum of to-wit, SEVEN HUNDRED AND NO/100 (\$700.00) DOLLARS for merchandise, goods, and chattels sold by Moore-Handley, Inc., a Corporation, on to-wit the 14th day of April, 1967, which sum of money with the interest thereon, is still unpaid.

LYONS, PIPES AND COOK
Attorneys for Plaintiff

By Walter M. Cook
Walter M. Cook

An itemized verified statement of account sued upon in Counts One and Two is hereto attached and made a part hereof.

Walter M. Cook
Walter M. Cook

Defendant may be served:
Stockton, Alabama

MOORE-HANDLEY, INCORPORATED
MOBILE, ALABAMA

REGISTER NO.

1AD 11331

SHIP DATE

CUSTOMER ORDER NO.

BUYER'S NAME

Work'd Ind.

Check'd Hold for Conf.

Billed With Ex. Ship

Called Pack. Ship

Pack'd Plain Tag

Ent. 30748 No. Subs.

No. D.O.

Parts Cons. Trial

With B/L

ORDER DAY SALESMAN

Face

SOLD TO:

Electronic Prod.

Stockton, Ala

SHIP TO

PAGE NO.

TERM EXCEPTIONS:

SUIAP

INVOICE DATE

BILLING INSTRUCTIONS:

No. Inv. Received

B. O. (Back Order), DISC. (Discontinued), REQ. (Reorder)
F.O.D.

PREPAID SHIP VIA

W/C

Coll. SPECIAL MARKS (Show on All Cartons) WHEN TO SHIP

White. Hds. Code	X or 0	Qty. Shd.	Qty. Ordered	UNIT	DESCRIPTION	PAGE NO.	UNIT PRICE	UNIT	DISCOUNT	LIST TOTAL	EXTENDED TOTAL
1	X		1	EA	10.10 PENN TRACTOR						
2	X				X of OP 100 PLOW ATTACH						
3	X				0 2PC4 RENT PL ATTACH		700.00			11	700.00
4											
5					from Sample Plow						
6											
7											
8											
9											
10											
11											
12											

Ext'd. Check'd Taxable Yes | No

We Certify that the goods covered by this Invoice were produced in compliance with the provisions of the Fair Labor Standards Act of the United States of America as last amended.
ITEMS ON THIS INVOICE ARE NOT RETURNABLE WITHOUT OUR PERMISSION.
Service Charge of 1 1/2% Per Mo. Will Be Charged On All Bills After Maturity.

IN REMITTING, PLEASE MENTION INVOICE DATE & TOTAL

PAYABLE AT PAR

EST. VAL.
Crs. OK
Krdex
Good
Yes
No
Entry
Ship.
FACTORY
DATE
AMT.
THIS MARGIN FOR COST DEPT. USE ONLY

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8051

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William W Chancey, individually and d/b/a
..Electronic Products.....
.....
.....

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.....

..... William W. Chancey, ind. and d/b/a Electronic Products....., Defendant.....

by Moore-Handley Inc. a corp.....

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

Witness my hand this.....21.....day of..... March..... 19 68

.....*William F. Luck*....., Clerk

No.....8051.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MOORE-HANDLEY, INC. a corp.

Plaintiffs

vs.

WILLIAM W. CHANCEY, INDIVIDUALLY
and d/b/a ELECTRONIC PRODUCTS

Defendants

SUMMONS AND COMPLAINT

Filed 3-21 19..68

Alice J. Duck Clerk

Lyons, Pipes & Cook

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
RECEIVED

MAR 21 1968

Received in Office
TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this April 7 19..68

by leaving a copy with

William W. Chancey

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 2.20
PROCESS(ES) OR A TOTAL OF \$ 3.70

Taylor Wilkins Sheriff
W. A. Talbot Deputy Sheriff

Stockton
22

333

MOORE-HANDLEY, INC.,
a corporation

Plaintiff

vs

WILLIAM W. CHANCEY, INDIVIDUALLY
AND DOING BUSINESS AS ELECTRONIC
PRODUCTS

Defendant

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

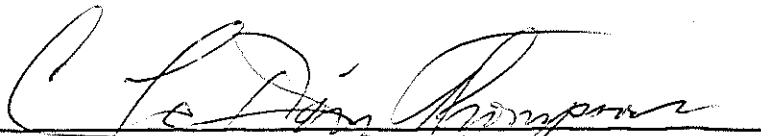
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 8051

Comes the defendant in the above styled cause and demurs
to the complaint filed in said cause and as grounds for
demurrer shows unto this Honorable Court as follows:


1. As to Count One thereof, said complaint fails to
state a cause of action.
2. As to Count Two thereof, said complaint fails to
state a cause of action.
3. As to Count Three thereof, said complaint fails
to state a cause of action.
4. That the affidavit attached to the alleged itemized
statement fails to allege that the individual signing same
was in charge of the permanent books and records at the
time of the sale.


Attorney for defendant.

Defendant respectfully demands a trial by jury.


Attorney for defendant.

I hereby certify that I have this 18 day of April,
1968, served a copy of the foregoing demurrers on Honorable
Walter Cook, attorney for plaintiff by mailing copy of same
postage prepaid to his address in Mobile, Alabama.



FILED

APR 18 1968

339

ALICE J. DUCK CLERK
REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

36601

AREA CODE 205

SAM W. PIPES, III

TEL. 432-4483

WALTER M. COOK

P.O. DRAWER 2525

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

March 20, 1968

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

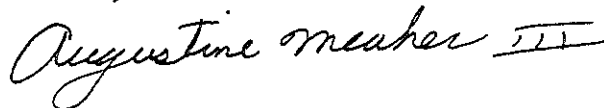
Re: Moore-Handley, Inc. vs. William W. Chancey, etal

Dear Mrs. Duck:

We enclose our Complaint in the above cause and ask that it be filed in your Court. Please advise us when service is obtained on the defendant.

Very truly yours,

LYONS, PIPES AND COOK



Augustine Meaher, III

AM/bn

Enclosures

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 16th day of May, 1968, being a regular day of said term, Moore-Handley, Inc., a corp.

recovered judgment against William W. Chancey, Ind. & d/b/a Electronic Products

Seven Hundred Thirty and no/100 plus \$60.00 interest to date- less \$20.00 paid for the sum of Dollars, and cost of suit, and affidavit having been made by Augustine Meahar, III Attorney that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

Material Sales Company, Inc., Fairhope, Alabama

has or is believed to have in it possession, or under its control money or effects belonging to said defendant William W. Chancey 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 Material Sales Company, Inc., Fairhope, Alabama

to file an answer in duplicate to the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, within 30 days from the service of the garnishment, or at the making its answer, or at any time intervening the time of serving the garnishment, and making the answer it was indebted to said defendant William W. Chancey and whether it will not be indebted in future to said defendant William W. Chancey 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 William W. Chancey

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

Witness, ALICE J. DUCK, Clerk of said Court, this 5th day of January, A. D., 1970

Issued 5th day of January A. D., 1970

ATTEST:

Alice J. Duck Clerk.

Received 6 day of January 1970
and on 8 day of JAN. 1970

served a copy of the within writ
Material Sales Co. Inc.

service on Wm. L. Ruffin, Jr.

TAYLOR WILKINS, Sheriff
By W. Ruffin, Jr. D. S.

in Fairhope, Ala

CIRCUIT COURT, BALDWIN COUNTY

No. 8051 1/2

MOORE-HANDLEY, INC., A CORP.

VS. } GARNISHMENT ON JUDGMENT

WILLIAM W. CHANCEY, Ind. & d/b/a
Electronic Products

SERVE: MATERIAL SALES, COMPANY, Inc, Garnishee

Issued 5th day of January 19 70

Returnable day of 19

BY W. Ruffin, Jr.
TAYLOR WILKINS, Sheriff
Ten Cents per mile Total \$ 7.00
Miles at 70

Augustine Meaher, II
Attorney

Wm. L. Ruffin, Jr.

STATE OF ALABAMA

Baldwin County

TO WILLIAM W. CHANCEY, Defendant.....:

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

Moore-Handley, Inc., a corp. Plaintiff.....versus William W. Chancey, Ind. & d/b/a Electronics Products Defendant.....

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

Material Sales Company, Inc., Fairhope, Alabama

has been named as Garnishee.....

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

5th day of January, 1970...
Clerk of the Circuit Court.

CASE NO. 8051 1/2

RECEIVED

JAN 6 1970

TAYLOR WILKINS
SHERIFF

Received 6 day of January 1970
and on _____ day of _____ 19____

I served a copy of the within notice
on William W. Chancey

By service on _____

TAYLOR WILKINS, Sheriff
By _____ D. S.

Subject no longer works
for Material Sales.

W.E.
1/8/70

Returned 9 day of Jan 1970

Not found in my county after diligent search and
guty, to Wm. W. Chancey

Taylor Wilkins, Sheriff
By Creek
Deputy Sheriff

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

WILLIAM W. CHANCEY

MOORE-MANDLEY, Inc., a Corp.

Plaintiff.....

VS.

WILLIAM W. CHANCEY

Defendant.....

Lyons, -Pipes & Cook

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

8051 1/2

CC LAW 12-2M-12/65

THE STATE OF ALABAMA }
MOBILE COUNTY

CIRCUIT COURT

Barbara Nicholson, a Notary Public

Personally appeared before me, ~~John B. Marshall, Clerk of the Circuit Court~~ in and for Mobile County
and State aforesaid Augustine Meaher, III

who being duly sworn, on oath says, that on the 16th day of May, 19 68
in the Circuit Court of Mobile County, in Case No. 8051 The Plaintiff Moore-Handley,
Inc., a corporation

recovered a judgment against William W. Chancey, individually and doing business
as Electronics Products

the Defendant, whose address
is Stockton, Alabama

for the sum of Seven Hundred Thirty and no/100 (\$730.00) of which
Twenty and no/100 (\$20.00) Dollars has been paid.

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

~~XXX~~ except for the payment of said \$20.00; that interest in the amount
of Sixty and no/100 (\$60.00) Dollars is due to plaintiff, and that

Material Sales Company, Inc., Fairhope, Alabama whose address is

~~whose address is~~ 558 Fairhope Avenue, Fairhope, Alabama

is supposed to be indebted to or have effects of the said William W. Chancey,

in its possession or under its
he control, and that ~~he~~ believes process of Garnishment against the said Material Sales Company, Inc.

is necessary to obtain satisfaction of said Judgment.

Augustine Meaher III
Augustine Meaher, III, as attorney
for Plaintiff.

Sworn to and subscribed this 30th

day of December A.D., 19 69

Barbara Nicholson
Notary Public, Mobile County ~~Alabama~~
Alabama

No.....

CIRCUIT COURT

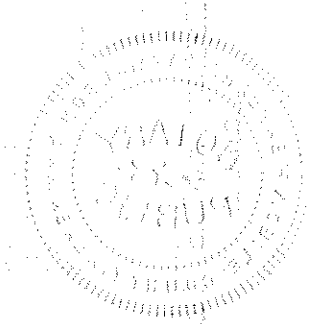
.....
vs.

.....
**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

.....
Filed in Office,

.....19.....

.....
Clerk.
.....



Material Sales Company, Inc.

560 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532
205 928-2325

DISTRIBUTORS
PLUMBING, HEATING & ELECTRIC
AIR COND. & EQUIP.

Jan. 10, 1970

BUILDING MATERIALS
PAINT - LUMBER - PLYWOOD
BUILDERS HARDWARE - ROOFING

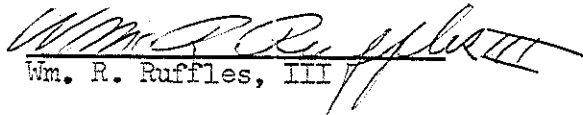
Mrs. Alice J. Duck
Clerk
Circuit Court, Baldwin County
Bay Minette, Ala.

Dear Mr. Duck:

Regarding garnishment on William W. Chancey, Ind. & d/b/a Electronic Products, we wish to advise you that as of Jan. 7, 1970, Mr. Chancey is no longer employed by Material Sales Co., Inc., and the company is in no way indebted to him.

Yours truly,

MATERIAL SALES COMPANY, INC.


Wm. R. Ruffles, III

cc:
Augustine Meaher, III Attorney

FILED

JAN 12 1970

ALICE J. DUCK

CLERK
REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

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AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

NORTON W. BROOKER, JR.

AREA CODE 205

TEL. 432-4463

P.O. DRAWER 2525

January 21, 1970

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

Re: Moore-Handley, Inc. vs William W. Chancey
Case No: 8051

Dear Mrs. Duck:

It appears that the defendant has terminated his employment with Material Sales Company in Fairhope, and therefore we ask that the Writ of Garnishment be vacated and the Cost Bill forwarded to our office.

Very truly yours,

LYONS, PIPES AND COOK

Augustine Meaher III

Augustine Meaher, III

AM/a

FILED

JAN 21 1970

CLERK
REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

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GORDON B. KAHN

G. SAGE LYONS

AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

NORTON W. BROOKER, JR.

December 29, 1969

805 1 1/2

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

Re: Moore-Handley, Inc. vs. William W. Chancey
Case No: 8051

Dear Mrs. Duck:

We acknowledge receipt of your notice that execution against Chancey has been returned NO PROPERTY FOUND. Accordingly we enclose our check in the amount of \$18.70 for Court costs. We understand that Chancey is employed at Material Sales Company in Fairhope as the Manager of their Appliance Department and our garnishment affidavit is enclosed. Please notify us when the employer files an Answer.

Very truly yours,

LYONS, PIPES AND COOK



Augustine Meaher, III
AM/bn

Enclosures

P.S. Please send us a copy of your schedule indicating when jury and non-jury motion dockets are sounded.

Augustine Meaher, III

STATE OF ALABAMA

Baldwin County

TO WILLIAM W. CHANCEY, Defendant.....:

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

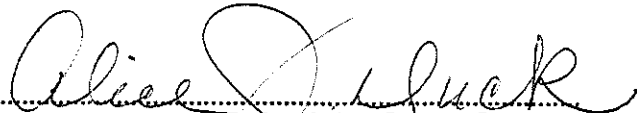
Moore-Handley, Inc., a corp. Plaintiff.....,versus William W. Chancey, Ind. & d/b/a Electronics Products Defendant.....,

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

Material Sales Company, Inc., Fairhope, Alabama

has been named as Garnishee.....

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

5th day of January, 1970..
Clerk of the Circuit Court.

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

.....
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.....
.....
Plaintiff.....

VS.

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.....
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.....
Defendant.....
