

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR - FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARO HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT

July 14, 1969

Miss Alice J. Duck
Clerk of the Circuit Court of Baldwin County
Baldwin County Court House
Bay Minnette, Alabama

no. 8197 1/2

Re: John C. Glover v. Noah A. Waldrop
Circuit Court of Baldwin County

Dear Miss Alice:

Enclosed are forms for garnishment to be filed in the above referenced case. If you need any further information, please contact me. If not, please do the necessary.

You will note that we did not have the proper forms for garnishment in Baldwin County. At your convenience, would you please us some forms for future use.

Your cooperation is greatly appreciated.

Yours very truly,

Ray C. [Signature]
For the Firm

LUS:jl

Enclosures

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

no. 8197 1/2

CC LAW 12-2M-9 67

THE STATE OF ALABAMA }
~~MOBILE~~ COUNTY
BALDWIN

CIRCUIT COURT

Alice J. Duck

Baldwin

Personally appeared before me, ~~John C. Waldrop~~, Clerk of the Circuit Court in and for ~~Mobile~~ County
and State aforesaid Larry U. Sims

who being duly sworn, on oath says, that on the 14th day of May, 19 69
Baldwin
in the Circuit Court of ~~Mobile~~ County, in Case No. XXXX The Plaintiff John C.

Glover

recovered a judgment against Noah A. Waldrop

the Defendant, whose address
is 1327 Lovett Lane, Daphne, Alabama

for the sum of Seven Hundred Fifty and No/100 (\$750.00)

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

whose address is Daphne, Alabama

is supposed to be indebted to or have effects of the said Noah A. Waldrop

in its possession or under its
control, and that he believes process of Garnishment against the said Daphne Texaco

is necessary to obtain satisfaction of said Judgment.

Larry U. Sims

Sworn to and subscribed this 17

day of July A.D., 19 69

Alice J. Duck
Clerk

GS-B-23-5M - 6/66

THE STATE OF ALABAMA
COUNTY OF ~~MOBILE~~
BALDWIN

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

YOU ARE COMMANDED TO SUMMON Daphne Texaco, Garnishee,
Circuit Court Baldwin Baldwin
to be and appear before the Court of General Sessions of ~~Mobile~~ County, at the Courthouse of ~~Mobile~~ County, on
the within 30 days day of June, 19 69, at the hour of ~~9:30~~ A.M., or answer on oath in writing,
as Garnishee, in what amount, if any, it was indebted to Noah A. Waldrop

_____, Defendant, at the time of the service of this Writ of Garnishment, or at the time of making said answer thereto, or at any time intervening the service of this Writ of Garnishment and making the said answer, and whether it will be indebted in the future to said defendant by a contract existing at the time of the serving of this Writ of Garnishment, or at the time of making the said answer, and whether it has in its possession, or under its control any personal or real property or things in action belonging to said defendant.

Witness my hand this 17 day of July, 1969.

Clerk of the ~~Circuit Court of Baldwin County, Alabama~~
Circuit Court of Baldwin County, Alabama

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 14th day of May, 1969, being a regular day of
said term, John C. Glover

recovered judgment against Noah A. Waldrop

for the sum of Seven hundred fifty and No/100 Dollars, and cost of suit,
and affidavit having been made by Larry U. Sims
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that
the following named persons or corporations, vis:

Daphne Texaco

has or is believed to have in their possession, or under their control money
or effects belonging to said defendant Noah A. Waldrop or that they is, or are
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

Daphne Texaco

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 30 days Monday in A. D. 19.....
then and there within the three first days of the Monday in A. D. 19.....
the service of the garnishment, or at the making their answer, or at any time intervening the time of
serving the garnishment, and making the answer they were indebted to said defendant
and whether they will not be indebted in future to said defendant
Noah A. Waldrop by a contract then existing, and whether by a contract then existing
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 proper-
ty, and whether they has not in their possession or under their
control money or effects belonging to the defendant Noah A. Waldrop

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

Witness, ALICE J. DUCK, Clerk of said Court, this 17 day of July, A. D., 1969.

Issued 17 day of July, A. D., 1969..

ATTEST:

Alice J. Duck, Clerk.

EX-79 17-69

Received 17 day of July 1969
and on 22 day of July 1969
I served a copy of the within attest
on Daphne Texaco

By service of Leahy Everett

TAYLOR WILKINS, Sheriff
By Ray Randall D.S.

Sheriff claims 54 miles at
Ten Cents per mile Total \$5.40
TAYLOR WILKINS, Sheriff
BY Randall
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 8197 1/2

John A. Glover

VS. } GARNISHMENT ON JUDGMENT

Noah A. Waldrop

Daphne Texaco

Garnishers

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Hand, Arendall, Redsoke, et c
Attorney

NOTICE TO GARNISHEE

GS-B-23-5M - 5/66

~~REPORT TO GENERAL SESSIONS~~
~~COURT ROOM FOR DISTRICT~~

THE STATE OF ALABAMA
COUNTY OF ~~MOBILE~~
BALDWIN

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

YOU ARE COMMANDED TO SUMMON Daphne Texaco, Garnishee,
Circuit Court Baldwin Baldwin
to be and appear before the ~~Court of General Sessions~~ of ~~MOBILE~~ County, at the Courthouse of ~~MOBILE~~ County, on
the _____ day of _____, 19 69, at the hour of ~~9:30~~ A.M., or answer on oath in writing,
as Garnishee, in what amount, if any, it was indebted to Noah A. Waldrop

_____, Defendant, at the time of the service of this Writ of Garnish-
ment, or at the time of making said answer thereto, or at any time intervening the service of this Writ of Garnish-
ment and making the said answer, and whether it will be indebted in the future to said defendant by a con-
tract existing at the time of the serving of this Writ of Garnishment, or at the time of making the said answer, and
whether it has in its possession, or under its control any personal or real property or things in action
belonging to said defendant.

Witness my hand this 17 day of July, 19 69.

Debbie J. Smith
Clerk of the ~~Court of General Sessions of Mobile County~~
Circuit Court of Baldwin County, Alabama

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 14th day of May 1969, being a regular day of said term, John C. Glover

recovered judgment against Noah H. Waldrop

for the sum of Seven hundred fifty and No/100 Dollars, and cost of suit, and affidavit having been made by Larry U. Sims that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

..... Daphne Texaco

has or is believed to have in their possession, or under their control money or effects belonging to said defendant Noah H. Waldrop or that they is, or are 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

..... Daphne Texaco

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 20 days Monday in A. D. 19....., then and there within the three first days of the Monday in A. D. 19.....

the service of the garnishment, or at the making their answer, or at any time intervening the time of serving the garnishment, and making the answer they were indebted to said defendant and whether they will not be indebted in future to said defendant Noah H. Waldrop by a contract then existing, and whether by a contract then existing 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 they has not in their possession or under their control money or effects belonging to the defendant Noah H. Waldrop

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

Witness, ALICE J. DUCK, Clerk of said Court, this 17 day of July A. D., 1969.

Issued 17 day of July A. D., 1969.

ATTEST:

..... Alice J. Duck Clerk.

IN THE CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA)

NOTICE TO DEFENDANT

COUNTY OF BALDWIN)

<u>JOHN C. GLOVER</u>	Judgment.....	\$750.00
Plaintiff	Interest.....	\$_____
<u>NOAH ALEX WALDROP</u>	Costs of Judgment.	\$_____
Defendant	Costs of Garnish-	
<u>DAPHNE TEXACO</u>	ment.....	\$_____
Garnishee	Total.....	\$_____

Take notice that I have this day issued a Writ of Garnishment, summoning Daphne Texaco, Daphne, Alabama, to appear before the Circuit Court of Baldwin County, Alabama on the within day of 30 days, 1969, at _____ o'clock A. M., to answer on oath as Garnishee, whether they were indebted to you or not.

Given under my hand this 17 day of July, 1969.

Rebecca Luck
Clerk of the Circuit Court of Baldwin
County, Alabama

NO. 8197 1/2

John Glover
vs.

Noah A. Waldrop

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Randall
DEPUTY SHERIFF

Received 17 day of July
and on 22 day of July 1969
I served a copy of the within notice
on Noah A. Waldrop 1969
By service on _____

TAYLOR WILKINS, Sheriff
BY Rory Randall D. S.
D. S.

John C. Glover
vs.
Noah A. Waldrop

Case # 8197 1/2

This is to state that Noah
A Waldrop does not work for
me, and has not since July
the 11th.

Signed L Everett
Manager of Texas service
Station Wapah, ALA.

FILED

AUG 8 1969

ALICE J. DUCK

CLERK
REGISTER