

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 .....4th.....day of.....September....., 19...68, being a regular day of said term, .....~~The American National Bank & Trust Company, A National Banking Association~~..... recovered judgment against .....Frank H. Lee.....

(\$139,479.45) Seventy-nine and 45/100 - -  
for the sum of ~~One Hundred Thirty-nine Thousand, Four Hundred~~..... Dollars, and cost of suit, and affidavit having been made by .....Charles R. Butler, Jr., of Hamilton, Denniston, Butler & Riddick..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

~~Uni-Crest Homes, a corporation, -Ala. Highway 59 - One Mile South of Stapleton toward Loxley,~~.....

has or is believed to have in .....its..... possession, or under .....its..... control money or effects belonging to said defendant ~~Frank H. Lee~~..... 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 .....Uni-Crest Homes, a Corporation,.....

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 ~~other~~ Answer in duplicate, within 30 days from service hereof, ~~Monday~~ ~~XXXXXX~~..... then and there within the three first days of the.....Monday in.....A. D. 19.....

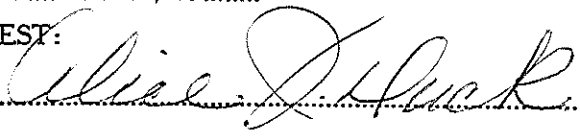
the service of the garnishment, or at the making.....its.....answer, or at any time intervening the time of serving the garnishment, and making the answer.....it..... was ..... indebted to said defendant Frank H. Lee..... and whether .....it..... will not be indebted in future to said defendant Frank H. Lee..... 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 .....Frank H. Lee.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....19th..... day of.....November....., A. D., 19...68

Issued .....19th.....day of.....November..... A. D., 19...68

ATTEST:

 Clerk.

CONFIDENTIAL

RECEIVED

NOV 19 1968

RECEIVED

CIRCUIT COURT, BALDWIN COUNTY

No. 8239 1/2

THE AMERICAN NATIONAL BANK & TRUST CO.,  
A National Banking Association,  
Plaintiff,

VS. GARNISHMENT ON JUDGMENT

FRANK H. LEE, Defendant

and:

UNI-CREST HOMES, A Corp.,  
Garnishee

Issued 19th day of Nov. 1968

Returnable day of 19

H. DENNISTON, BUTLER & RIDDICK  
Attorney

Moore Printing Co. - Bay Minette, Alabama

THE AMERICAN NATIONAL BANK AND TRUST	:	IN THE CIRCUIT COURT OF
COMPANY, a National Banking Association,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
VS.	:	
	:	NO. 8239½
FRANK H. LEE,	:	
Defendant,	:	
INTERNATIONAL ACCEPTANCE CORPORATION,	:	
Garnishee.	:	

ANSWER OF GARNISHEE

Comes now INTERNATIONAL ACCEPTANCE CORPORATION, Garnishee in the above styled cause, and for answer to the Writ of Garnishment heretofore served on an agent, servant or employee of Garnishee, says as follows:

1. The Garnishee is indebted to the Defendant, FRANK H. LEE, at the time of the service of the Writ of Garnishment in said cause and at the time of making this Answer, for a very large sum of money, the exact amount of which is not presently known to it, but which is represented by the promissory note formerly held by Plaintiff and purchased from Plaintiff by Defendant; also, said Defendant owns the capital stock of Garnishee, subject to prior pledge to the Citizens & Southern National Bank as Trustee for itself and others; and Garnishee does not expect to be further indebted in the future to said Defendant by a contract existing at the time of the service of the Garnishment and making of this Answer, other than herein set forth.

INTERNATIONAL ACCEPTANCE CORPORATION

By   
President

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

BEFORE ME, the undersigned authority, personally appeared FRANK H. LEE, who is known to me and who, being by me duly sworn, on oath deposes and says:

That he is president of International Acceptance Corporation,  
and being informed of the contents of the foregoing instrument, and being  
informed of the truth of the facts contained therein, he voluntarily  
executed the same for and as the act of said Corporation.

Frank H. Lee

Affiant

Sworn to and subscribed before me on this  
the 14th day of December, 1968.

Green Dolph L. Brannon

Notary Public, State of Alabama at Large

My Commission Expires:

January 11, 1970

FILED

DEC 27 1968

ALICE J. DUCK CLERK  
REGISTER

AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT

CC LAW 12-2M-12/65

8239 1/2

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

CIRCUIT COURT

Personally appeared before me, John E. Mandeville, Clerk of the Circuit Court in and for Mobile County and State aforesaid ..... Charles R. Butler, Jr. ....

who being duly sworn, on oath says, that on the 4th day of September, 1968

in the Circuit Court of ~~MOBILE~~ Baldwin County, in Case No. 8239 The Plaintiff The American

National Bank & Trust Company, A National Banking Association

recovered a judgment against Frank H. Lee

the Defendant, whose address is Uni-Crest Homes, on Alabama Highway 59

for the sum of ONE HUNDRED THIRTY-NINE THOUSAND FOUR HUNDRED SEVENTY-NINE and 45/100 (\$139,479.45) DOLLARS

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

that Uni-Crest Homes, a corporation; Tidewater Homes, Inc., a

corporation; Bienville Investment Company, Inc., a corporation

and International Acceptance Corporation, a corporation

addresses are whose addresses One mile South of Stapleton toward Loxley on

Alabama Highway 59

are supposed to be indebted to or have effects of the said Frank H. Lee

in their possession or under their control

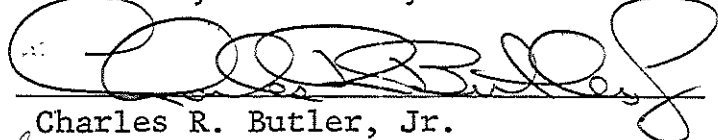
control, and that he believes process of Garnishment against the said above corporations:

Uni-Crest Homes, Tidewater Homes, Inc., Bienville Investment

Company, Inc., and International Acceptance Corporation

is necessary to obtain satisfaction of said Judgment.

HAMILTON, DENNISTON, BUTLER & RIDDICK

  
Charles R. Butler, Jr.

Sworn to and subscribed this 18th day of

November A.D., 1968



NOTARY PUBLIC MOBILE COUNTY, ALABAMA

FILED

NOV 19 1968

ALICE J. BUCK CLERK REGISTER

No. 8239

CIRCUIT COURT

The American National Bank

vs.

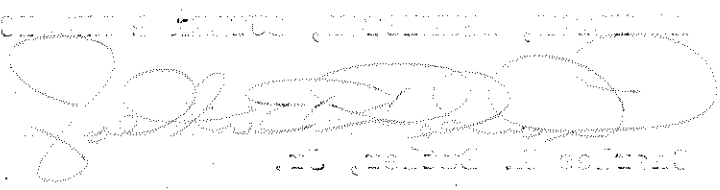
Frank H. Lee

AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT

Filed in Office,

19

Clerk.



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 .....4th.....day of.....September....., 19..68., being a regular day of said term, The American National Bank & Trust Company, A National Banking Association

recovered judgment against ..... Frank H. Lee

(\$139,479.45) ..... Seventy-nine and 45/100 - -  
for the sum of One Hundred Thirty-nine Thousand, Four Hundred /..... Dollars, and cost of suit,  
and affidavit having been made by Charles R. Butler, Jr., of Hamilton, Denniston, Butler & Riddick,  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that  
the following named persons or corporations, vis:

Tidewater Homes, Inc., a corporation- One Mile South of Stapleton on Ala. Hwy. 59

has or is believed to have in .....its..... possession, or under .....its..... control money  
or effects belonging to said defendant Frank H. Lee..... 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 ..... Tidewater Homes, Inc., a corp.,

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, or the ..... Answer in Duplicate within 30 days from service hereof,  
then and there within the three first days of the ..... Monday in ..... A-D-19.....  
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  
Frank H. Lee ..... and whether ..... it ..... will not be indebted in future to said defendant  
Frank H. Lee ..... 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 ..... Frank H. Lee

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....19th..... day of.....November, A. D., 1968..

Issued .....19th.....day of .....November..... A. D., 19..68

ATTEST.

*Alice J. Duck*, Clerk.

ORIGINAL

Received 19 day of Nov. 1968  
and on 21 day of Nov. 1968  
I received a copy of the within Deed  
of Tidewater Homes, Inc.

By service on Robert Denniston

TAYLOR WILKINS Sheriff  
By W. C. DeLoach  
Shapels  
24 miles at  
Sheriff claims  
Ten Cents per mile Total \$ 2.40  
TAYLOR WILKINS, Sheriff  
BY DeLoach DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 8239  $\frac{1}{2}$

THE AMERICAN NATIONAL BANK & TRUST CO.,  
A National Banking Association,  
Plaintiff,

VS. } GARNISHMENT ON JUDGMENT

FRANK H. LEE,  
and Defendant,

TIDEWATER HOMES, INC., A CORP.,  
Garnishee  
Defendant

Issued 19th day of Nov. 1968

Returnable day of 19

HAMILTON, DENNISTON, BUTLER & RIDDICK  
Attorney

Moore Printing Co. - Bay Minette, 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 .....4th.....day of.....September....., 19...68, being a regular day of said term, The American National Bank & Trust Company, A National Banking Association

recovered judgment against ..... Frank H. Lee

(\$139,479.45) ..... Seventy-nine and 45/100-  
for the sum of One Hundred Thirty-nine Thousand, Four Hundred/..... Dollars, and cost of suit,

and affidavit having been made by Charles R. Butler, Jr., of Hamilton, Denniston, Butler & Riddick, that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

Bienville Investment Company, Inc., a Corporation - One Mile South of Stapleton toward Loxley on Alabama Hwy. 59

has or is believed to have in .....its..... possession, or under .....its..... control money or effects belonging to said defendant..... Frank H. Lee..... 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 Bienville Investment Company Inc., a corporation

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 ..... ANSWER IN DUPLICATE- within 30 days from Service hereof, ~~on the ..... Monday in ..... A-D-19.....~~ ~~then and there within the three first days of the~~ ..... Monday in ..... A-D-19.....

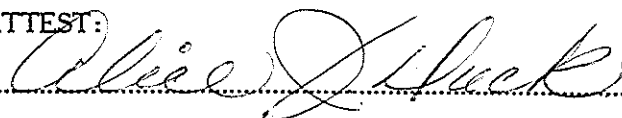
the service of the garnishment, or at the making.....its..... answer, or at any time intervening the time of serving the garnishment, and making the answer.....it..... was ..... indebted to said defendant Frank H. Lee..... and whether .....it..... will not be indebted in future to said defendant Frank H. Lee..... 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 ..... Frank H. Lee

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....19th..... day of.....November., A. D., 19.68..

Issued .....19th.....day ofNovember..... A. D., 19.68..

ATTEST:

 Clerk.

45223

ORIGINAL

1914 day of Nov 1968

and a copy of the within writ  
Brenville Investment Co. Inc.

By service of Robert Denniston

TAYLOR WILKINS, Sheriff  
By W. C. Walker, Jr. J. 3.

Sheriff claims Jones at

Ten Cents per mile Total \$ 2.40

TAYLOR WILKINS, Sheriff

By Walker  
DEPUTY SHERIFF

48  
114  
01 1/2

CIRCUIT COURT, BALDWIN COUNTY

No. 8239 1/2

The American National Bank & Trust Co.,  
A National Banking Association,

Plaintiff,

VS. } GARNISHMENT ON JUDGMENT

Frank H. Lee, Defendant

and;

Bienville Investment Company, Inc. a corp.,

Garnishee,

Issued 19th day of Nov. 1968

Returnable day of 19

HAMILTON, DENNISTON, BUTLER & RIDDICK  
Attorney

Moore Printing Co. - Bay Minette, Alabama

STATE OF ALABAMA

Baldwin County

TO Frank H. Lee Defendant.....

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of..  
Association,  
THE AMERICAN NATIONAL BANK & TRUST COMPANY, A National Banking / Plaintiff.....  
versus FRANK H. LEE Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which Uni-Crest Homes, a corp.;  
Tidewater Homes, Inc., a corp.; Bienville Investment Co., Inc., a corp.; and International  
Acceptance Corporation, a corp.,  
have been named as Garnishee....&.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the .....  
19th day of November, 19 68

  
Clerk of the Circuit Court.

Ex. 11-26-28

Received 19th day of Nov. 1968  
and on 26 day of Nov. 1968  
I served a copy of the within Notice  
on Frank H. Lee

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W A Tolbert D. S.

Steph  
miles at 2.22

Sheriff claims \_\_\_\_\_  
Ten Cents per mile Total \$ 2.22  
TAYLOR WILKINS, Sheriff  
BY Tolbert  
DEPUTY SHERIFF

ORIGINAL

#8239½

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

FRANK H. LEE - Uni-Crest Homes  
on Ala. Hwy. #59

THE AMERICAN NATIONAL BANK & TRUST  
COMPANY, A National Banking Association,  
Plaintiff....

VS.

FRANK H. LEE

Defendant....

Hamilton, Denniston, Butler & Riddick

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 .....4th.....day of.....September....., 19..68., being a regular day of said term, ..The American National Bank & Trust Company, ..A National Banking Association  
recovered judgment against ..... Frank H. Lee

(\$139,479.45) for the sum of One Hundred ThirtyNine Thousand, Four Hundred Seventy-nine and 45/100 - Dollars, and cost of suit, and affidavit having been made by Charles R. Butler, Jr., of Hamilton, Denniston, Butler & Riddick, that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

International Acceptance Corporation, a corporation, One Mile South of Stapleton toward Ioxley on Ala. Hwy. 59

has or is believed to have in .....its..... possession, or under .....its..... control money or effects belonging to said defendant Frank H. Lee 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 ..... International Acceptance Corporation, a corporation,

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..... 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.....its.....answer, or at any time intervening the time of serving the garnishment, and making the answer.....it..... was ..... indebted to said defendant Frank H. Lee and whether .....it..... will not be indebted in future to said defendant Frank H. Lee 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 ..... Frank H. Lee

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....19th..... day of.....Nov....., A. D., 1968...  
Issued .....19th.....day of.....Nov..... A. D., 19..68..

ATTEST:

*Alice J. Duck* Clerk.

Received 19th day of Nov. 1968  
and on 20 day of Nov 1968.

I served a copy of the within Just  
on International Acceptance Corp.

By service on Frank H. Lee

TAYLOR WILKINS, Sheriff  
By W. C. Wallace, Jr.

Sheriff claims 36 miles at

Ten Cents per mile Total \$ 2.90

TAYLOR WILKINS, Sheriff  
BY Wallace  
DEPUTY SHERIFF

ORIGINAL

CIRCUIT COURT, BALDWIN COUNTY

No. 8239 1/2

THE AMERICAN NATIONAL BANK & TRUST CO.,  
A National Banking Association,

Plaintiff,

VS. GARNISHMENT ON JUDGMENT

FRANK H. LEE,  
Defendant,

and

International Acceptance Corp., a corp.,

Garnishee

Issued 19th day of Nov. 1968

Returnable day of 19  

HAMILTON, DENNISTON, BUTLER & KIDDICK  
Attorney

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 4th.....day of.....September....., 19..68., being a regular day of said term, .....The American National Bank & Trust Company, A National Banking Association..... recovered judgment against ..... Frank H. Lee.....

(\$139,479.45) ..... Seventy-nine and 45/100 - -  
for the sum of One Hundred Thirty-nine Thousand, Four Hundred/..... Dollars, and cost of suit, and affidavit having been made by ..... Charles R. Butler, Jr., of Hamilton, Denniston, Butler & Riddick that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:  
Uni-Crest Homes, a corporation, -Ala. Highway 59 - One Mile South of Stapleton toward Loxley.....

has or is believed to have in ..... its ..... possession, or under ..... its ..... control money or effects belonging to said defendant Frank H. Lee..... 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 ..... Uni-Crest Homes, a Corporation,

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~~ Answer in duplicate, within 30 days from service hereof, ~~then and there within the three first days of the~~ ~~Monday in~~ ~~A. D. 19~~.....

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 Frank H. Lee..... and whether ..... it ..... will not be indebted in future to said defendant Frank H. Lee..... 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 ..... Frank H. Lee.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this..... 19th..... day of November....., A. D., 19..68.

Issued ..... 19th..... day of November..... A. D., 19..68.

ATTEST:

*Alice J. Duck*, Clerk.

ORIGINAL

Received 19 day of Nov 1968  
served a copy of the within writ  
on Uni-Crest Homes, a Corp.

By service on

TAYLOR WILKINS, Sheriff

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

Returned 26 day of Nov 1968  
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By W. A. Zalkert  
Deputy Sheriff

CIRCUIT COURT, BALDWIN COUNTY

No. 8239 1/2

THE AMERICAN NATIONAL BANK & TRUST CO.,  
A National Banking Association,  
Plaintiff,

VS. GARNISHMENT ON JUDGMENT

FRANK H. LEE, Defendant

and:

UNI-CREST HOMES, A Corp.,  
Garnishee

Issued 19th day of Nov. 1968

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

HAMILTON, DENNISTON, BUTLER & RIDDICK

Attorney

Moore Printing Co. - Bay Minette, Alabama



THE AMERICAN NATIONAL BANK AND TRUST COMPANY,	:	IN THE CIRCUIT COURT OF
a National Banking Association,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
VS.	:	
FRANK H. LEE,	:	NO. 8,239½
Defendant,	:	
TIDE WATER HOMES, INC.,	:	
Garnishee.	:	

ANSWER OF GARNISHEE

Comes now TIDE-WATER HOMES, INC., Garnishee in the above styled cause, and for answer to the WRIT OF GARNISHMENT heretofore served on an agent, servant or employee of Garnishee, says as follows:

1. The Garnishee, TIDE-WATER HOMES, INC., the correct name of which is TIDE-WATER HOMES CORPORATION, is not indebted to the defendant FRANK H. LEE, at the time of the service of the WRIT OF GARNISHMENT in said cause, or at the time of making this answer, and it does not expect to be indebted in the future to said Defendant by a contract existing at the time of the service of the Garnishment and making of this answer, and the said Garnishee does not have in its possession, or under its control, money or effects belonging to the said Defendant.

TIDE-WATER HOMES CORPORATION

By James P. Richmond  
Its Assistant Treasurer

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Before me, the undersigned authority, personally appeared James P. Richmond, who is known to me and who, being by me duly sworn, on oath deposes and says: That he is Assistant Treasurer of TIDE-WATER HOMES CORPORATION, and being informed of the contents of the foregoing instrument and being informed of the truth of the facts contained therein, he voluntarily executed the same for and as the act of said Corporation..

James P. Richmond  
AFFIANT

Sworn to and Subscribed before me  
on this the 9 day of December, 1968.

William K. Garrett  
Notary Public, Baldwin County, Alabama

My Commission Expires: November 17, 1970

THE AMERICAN NATIONAL BANK AND TRUST COMPANY, : IN THE CIRCUIT COURT OF  
a National Banking Association, :  
: Plaintiff, : BALDWIN COUNTY, ALABAMA  
VS. :  
: 82-39 1/2  
FRANK H. LEE, :  
: Defendant, :  
BIENVILLE INVESTMENT COMPANY, INC., :  
: Garnishee. :

ANSWER OF GARNISHEE

Comes now BIENVILLE INVESTMENT COMPANY, INC., Garnishee in the above styled cause, and for answer to the WRIT OF GARNISHMENT heretofore served on an agent, servant or employee of Garnishee, says as follows:

1. The Garnishee, BIENVILLE INVESTMENT COMPANY, INC., the correct name of which is BIENVILLE INVESTMENT CORPORATION, is not indebted to the Defendant, FRANK H. LEE, at the time of the service of the WRIT OF GARNISHMENT in said cause, or at the time of making this answer, and it does not expect to be indebted in the future to said Defendant by a contract existing at the time of the service of the Garnishment and making of this answer, and the said Garnishee does not have in its possession, or under its control, money or effects belonging to the said Defendant.

BIENVILLE INVESTMENT CORPORATION.

By James P. Richmond  
Its Assistant Treasurer

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Before me, the undersigned authority, personally appeared James P. Richmond, who is known to me and who, being by me duly sworn, on oath deposes and says: That he is Assistant Treasurer of BIENVILLE INVESTMENT CORPORATION, and being informed of the contents of the foregoing instrument and being informed of the truth of the facts contained therein, he voluntarily executed the same for and as the act of said Corporation.

James P. Richmond  
AFFIANT

Sworn to and Subscribed before me  
on this the 9 day of December, 1968.

William H. Bennett  
Notary Public, Baldwin County, Alabama

My Commission Expires: November 17, 1970

FILED

DEC 20 1968

ALICE J. DUCK CLERK  
REGISTER

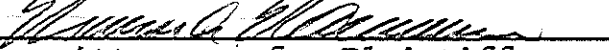
THE AMERICAN NATIONAL BANK	)	IN THE CIRCUIT COURT OF
& TRUST COMPANY,	)	BALDWIN COUNTY, ALABAMA,
Plaintiff,	)	AT LAW NO. 8239-1/2A
vs.	)	
FRANK H. LEE,	)	
Defendant,	)	
GREAT AMERICAN HOMES	)	
CORPORATION, a corporation,	)	
Garnishee.	)	

DEMAND FOR ORAL ANSWER

Now comes the Plaintiff in the above styled cause  
and demands an oral examination of the Garnishee in this cause.

Dated this the 13th day of December, 1971.

HAMILTON, BUTLER, RIDDICK & LATOUR

By   
Attorneys for Plaintiff

Address: P. O. Box 1743  
Mobile, Alabama 36601

**FILED**

DEC 15 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

THE AMERICAN NATIONAL BANK  
& TRUST COMPANY,

Plaintiff,

vs.

FRANK H. LEE,

Defendant,

GREAT AMERICAN HOMES  
CORPORATION, a corporation,

Garnishee.

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA,  
) AT LAW NO. 8239-1/2A  
)  
)  
)  
)  
)

ORDER FOR ORAL EXAMINATION

To Great American Homes Corporation:

The Plaintiff in this case having made an application for an oral examination of the Garnishee in this cause, you are hereby notified to be and appear before me on the 26<sup>th</sup> day of January, 1972, at 9:00 o'clock A.M., at the Court House in Baldwin County, Alabama, to answer orally as the Garnishee in the above entitled cause.

Witness my hand this the 13th day of December, 1971.

**FILED**

DEC 15 1971

J. Blair S. Madhoun  
CIRCUIT JUDGE

EUNICE B. BLACKMON CIRCUIT  
CLERK

SHERIFF'S RETURN

Executed by handing a copy of the above to \_\_\_\_\_

Frank H. Lee, as Defendant of Great American Homes Corporation, on this the 24 day of January, 197 2.

L. B. Galt 1/24/72  
SHERIFF

82354A

American National  
Bank & Trust

to

Frank H. Lee  
Legal

Chief American Home,  
Long - Beach

**FILED**

DEC 15 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

DEC 15 1971

TAYLOR WILKINS  
SHERIFF

Heavenly Bodies, Riders  
& Riders

1500  
THE AMERICAN NATIONAL BANK & TRUST CO.,  
A National Banking Association,

Plaintiff,

VS.

FRANK H. LEE

Defendant

Great American Homes Corp., a  
Corporation, Garnishee

IN THE  
CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, AT LAW  
NO. 8239½A

FRANK H. LEE, THE DEFENDANT, BEING FIRST DULY SWORN, TESTIFIED  
AS FOLLOWS:

Examination by Mr. Hamilton.

Q. You are Mr. Frank H. Lee?

A. Yes sir.

Q. Mr. Lee, in connection with this judgment of the American National Bank & Trust Co. of Mobile against you personally for some \$139,000.00 or \$140,000.00, as you know a garnishment was filed and you, on behalf of your Company, Great American Homes Corporation, answered not indebted, and this hearing is on oral examination and I want to ask you some questions about your Company and connections with it.

Q. Are you President of Great American Homes Corporation?

A. Yes sir.

Q. How long have you been such?

A. Since the inception.

Q. Are you a stockholder of the Company?

A. No sir.

Q. Who owns the stock in the Company?

A. My wife, my son, Howell Lee and B. N. Ivey.

Q. Who is Mr. Ivey, is he a relative of yours?

A. No.

Q. In what proportion is the stock owned by each?

A. I could not answer that off hand exactly - - I would say probably equal between my son and my wife = = probably 45 or 46%.

Q. You have remarried, have you?

A. Yes.

Q. When?

A. Approximately three years ago.

Q. When was Great American Homes organized?

A. in 1969 I believe.

Q. Were you married then?

A. Yes sir.

Q. What salary are you paid by Great American Homes as its President?

A. I am not paid a salary.

Q. Do you work for nothing?

A. Yes sir.

Q. What sources of income do you have?

A. I don't have any income now,,Mr. Hamilton.

Q. Has the Corporation paid any dividends since its formation?

A. No sir.

Q. What does the corporation own?

A. What manner are you talking about?

Q. In general what are its assets?

A. Construction equipment, trucks and cars and the normal construction things.

Q. Does it own any real property?

A. No.

Q. When your son and your wife and Mr. Ivey acquired stock in the corporation what consideration was paid?

A. They paid the book value at the time - something like \$6,000.00 or \$7,000.00

Q. What is the present book value?

A. I could not answer that, sir. I don't know .

Q. Did they pay cash?

A. Yes sir.

Q. How much did you wife pay?

A. She would have paid her prorata part; I don't recall the exact percentage.

Q. And you work for the corporation without any recompense whatever?

A. I'm not working full time; I only work part time. I was

(page 2)

in the hospital for six months with a heart attack last year - last January; I came back in June and Howell came with me when he got out of college and in July I started back very little time working. I go down may be a couple of hours a day.

Q. Were you ever paid a salary by the Corporation?

A. Yes sir.

Q. Up until when?

A. Up until probably June or July of last year.

Q. But you are still working for the Company and still President?

A. I am President and I work part time; some days I don't go down at all and some days I go down for an hour and sometimes in the morning I go for an hour and in the afternoon for an hour.

Q. The Corporation is active?

A. Yes sir.

Q. Is it engaged in building homes under the Farm Home - Farmers Home Administration plan?

A. Yes sir.

Q. Any other activities?

A. No sir.

Q. How many houses does it have under construction now?

A. I don't know sir; I could not answer that.

Q. Does it buy the land on which the houses are constructed?

A. Yes sir.

Q. And then builds and re-sells?

A. Yes sir.

Q. I have here a copy of Area Magazine dated September 1971 with a write-up of your operations and pictures - a picture of one of the houses you have constructed and you are in the picture and it speaks of Frank Lee, President of the Great American Homes, discussing along with the President of the Camden National Bank, and the homes Frank Lee could build. Is that designation of the Company - a Frank Lee Company erroneous?

A. I would say it would be, sir, per se it would yes sir.



Q. Did you say how many houses are under construction now?

A. I answered - I don't know.

Q. Would you estimate?

A. No.

Q. How many are usually under construction?

A. Mr. Hamilton, I don't keep up with it that thoroughly now.

Q. Your estimate - -

A. - - I would say we have probably 20 or 25.

Q. What other occupation do you have? - - You say that you work part time for the Corporation?

A. I don't have any other occupation.

Q. Does your wife have substantial means?

A. Yes sir.

Q. What does she do?

A. Works for the Corporation.

Q. Does she draw a salary?

A. Yes sir.

Q. How much \$14,000.00 or \$15,000.00 a year.

Q. How long has she worked for the Corporation?

A. Ever since it has been started.

Q. Has she drawn a salary like that from the inception?

A. She probably has for the last year; she drew some salary prior to that.

Q. What salary does your son draw?

a. \$16,000.00 a year.

Q. Your wife draws \$14,000.00 and your son \$16,000.00 a year?

A. Yes sir.

Q. Is the corporation making a profit now?

A. It makes a little.

Q. Did you put anything at all into that Corporation by way of money or property?

A. To start with?

Q. Yes?

A. No sir - - I put borrowed money to start with.

Q. You borrowed money?

A. Yes sir.

Q. How was that handled with the Corporation. Did it borrow money from you?

A. That is right; it was borrowed not from me but a third party and paid back.

Q. Who borrowed it?

A. I did.

Q. How did the corporation get it?

A. Got it directly from the man that it was borrowed from.

Q. Frank, how do you propose to handle this judgment of the Bank against you?

A. I don't have any idea, Mr. Hamilton.

Q. You have no assets now?

A. No sir.

-----  
C E R T I F I C A T E

I, Louise Dusenbury, Official Court Reporter, 28th Judicial Circuit of Alabama, hereby certify that the foregoing testimony was taken by me in open Court, before Judge Telfair J. Mashburn, Judge of said Court, on Wednesday, January 26, 1972.

This 26th day of January, 1972.

Louise Dusenbury  
Official Court Reporter

STATE OF ALABAMA

Baldwin County

TO FRANK H. LEE....., Defendant.....:

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

The American National Bank & Trust Co. a National Banking Association Plaintiff.....,versus Frank H. Lee....., Defendant.....,

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

Great American Homes Corporation, a corp. Camden, Alabama.....

has..... been named as Garnishee.....

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

12th, day of Oct......, 1971........  
Clerk of the Circuit Court.

10/26/71

W-8 24

10-13-71

Executed this the 26 day of Oct, 1971,  
by leaving a copy of the within summons and com-  
plaint with

Frank H. Lee

Respondent  
Sheriff of Wilcox County, GA.  
Deputy Sheriff, Wilcox County, GA.

8239 1/2 A

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

FRANK H. LEE

THE AMERICAN NATIONAL BANK & TRUST

CO. A NATIONAL BANKING ASSOCIATION

Plaintiff....

VS.

FRANK H. LEE

Defendant....

OCT 13 1971

TAYLOR WILKINS

SHERIFF

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Sept. .... Term, 19<sup>68</sup>....., of the Circuit Court of Baldwin County, to-wit: On the ..... 4th ..... day of ..... Sept. ...., 19<sup>68</sup>....., being a regular day of said term, ..... The American National Bank & Trust Company, a National Banking Association

recovered judgment against ..... Frank H. Lee

for the sum of ..... One Hundred Thirty-nine Thousand Four Hundred ..... Seventy-nine & 45/100 Dollars, and cost of suit, and affidavit having been made by ..... Thomas A. Hamilton 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:

..... Great American Homes Corporation, a corporation

has or is believed to have in ..... its ..... possession, or under ..... its ..... control money or effects belonging to said defendant ..... Frank H. Lee ..... 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, 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 ..... Great American Homes Corporation, a corporation, Camden, 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 Frank H. Lee ..... and whether ..... it ..... will not be indebted in future to said defendant Frank H. Lee ..... 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..... Frank H. Lee

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

Witness, ....., Clerk of said Court, this..... 12th ..... day of ..... October ..... A. D., 1971..

Issued ..... 12th ..... day of ..... October ..... A. D., 19<sup>71</sup>.....

ATTEST:

..... Eunice B. Blackmon Clerk

Executed this the 26 day of Oct, 1971,  
by leaving a copy of the within summons and com-

plaint with

Frank H. Lee

Grand Juror

Great American Homes

Shirley Wilkins  
Deputy Sheriff, Baldwin County, Ala.

CIRCUIT COURT, BALDWIN COUNTY

No. 82393A

THE AMERICAN NATIONAL BANK & TRUST CO.,  
A NATIONAL BANKING ASSOCIATION

VS. } GARNISHMENT ON JUDGMENT

FRANK H. LEE

Great American Homes Corporation, a  
corporation Camden, Alabama  
Garnishee

Issued 12th day of Oct. 19 71

Returnable        day of        19       

OCT 13 1971

TAYLOR WILKINS  
SHERIFF

Thomas A. Hamilton  
P. O. Box 1743 Attorney  
Mobile, Alabama 36601  
Moore Printing Co. - Bay Minette, Ala.

11/92/01  
BSW

ANSWER TO GARNISHMENT ON JUDGMENT

STATE OF ALABAMA     X  
COUNTY OF BALDWIN   X

IN CIRCUIT COURT, BALDWIN COUNTY, ALABAMA

THE AMERICAN NATIONAL BANK & TRUST COMPANY, PLAINTIFF  
VS.

GREAT AMERICAN HOMES CORPORATION, A CORPORATION, GARNISHEE

8239 1/2 A

Now comes Great American Homes Corporation, a Corporation and files this answer to Writ of Garnishment served on the President of the Corporation on October 26, 1971, by the Sheriff of Wilcox County, Alabama, wherein Great American Homes Corporation was required to answer in duplicate to the Circuit Court for Baldwin County at the Court House thereof in the City of Bay Minette, within thirty (30) days from the service of the garnishment, or at the making its answer, or at any time intervening the time of serving this garnishment, and making the answer it was indebted to the said Frank H. Lee and whether it will not be indebted in future to the said Frank H. Lee 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, Frank H. Lee.

In answer to said garnishment the undersigned Great American Homes Corporation does say as follows, and to-wit:

1. That at the time of making its answer or anytime intervening the time of serving the garnishment, and making the answer, it was not indebted to the said defendant, Frank H. Lee and it will not be indebted in future to the said defendant, Frank H. Lee, by a contract then existing, and there is no contract existing during this period whereby this Corporation is liable to the said defendant, Frank H. Lee, 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 this Corporation does not have in its possession or under its control money or effects belonging to the said defendant.

And having fully answered, Garnishee prays that it may go hence with its costs in its behalf expended.

GREAT AMERICAN HOMES CORPORATION

Arthur M. Homer, Jr.  
ATTORNEY FOR GARNISHEE

BY: F. H. Lee  
President

Sworn and subscribed before me this 18th day of November, 1971.

MY COMMISSION EXPIRES:  
3/11/74

Joyce V. Warren  
STATE OF ALABAMA AT LARGE

**FILED**

NOV 23 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

HAMILTON, BUTLER, RIDDICK & LATOUR

ATTORNEYS AND COUNSELLORS AT LAW

AMERICAN NATIONAL BANK BUILDING

P. O. BOX 1743

MOBILE, ALABAMA

36601

THOMAS A. HAMILTON  
CHARLES R. BUTLER  
HARRY H. RIDDICK  
OLIVER J. LATOUR, JR.  
JAMES W. TARTLTON, III

JOSEPH M. ALLEN, JR.  
JANELLA J. WOOD

PETER HAMILTON (1836-1888)  
THOMAS A. HAMILTON (1844-1897)  
J. GAILLARD HAMILTON (1899-1956)

CABLE ADDRESS:  
HAMILTONS

TELEPHONE: 432-7517  
AREA CODE 205

October 11, 1971

Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama 36507

Dear Mrs. Duck:

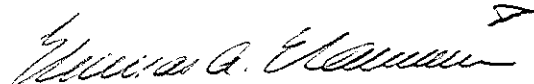
Enclosed is affidavit for garnishment on judgment of The American National Bank & Trust Company against Frank H. Lee, naming Great American Homes Corporation as garnishee.

Both the defendant and the garnishee are in Camden, Alabama, and have offices over the bank there.

Please let writ of garnishment issue and send same for service to the Sheriff of Lowndes County, at Camden, Alabama.

Thanking you, I am

Yours respectfully,



For the Firm

TAH:gnj  
#20,268  
Enclosure

cc: Mr. Ed Cannon



AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT

CC LAW 12-2M-6-69

THE STATE OF ALABAMA }  
MOBILE COUNTY

CIRCUIT COURT

the undersigned authority,  
Personally appeared before me, ~~John F. Henderson, Clerk of the Circuit Court~~ in and for Mobile County  
and State aforesaid Thomas A. Hamilton

who being duly sworn, on oath says, that on the 4th day of September, 19 68  
in the Circuit Court of Baldwin County, in Case No. 8239-1/2 The Plaintiff The American  
National Bank & Trust Company, a National Banking Association,

recovered a judgment against Frank H. Lee

the Defendant, whose address  
is Camden, Alabama

for the sum of One Hundred Thirty-nine Thousand Four Hundred Seventy-nine & 45/100  
Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;  
that Great American Homes Corporation, a corporation,

whose address is Camden, Alabama

is supposed to be indebted to or have effects of the said Frank H. Lee

in its possession or under its  
control, and that he believes process of Garnishment against the said Great American Homes  
Corporation

is necessary to obtain satisfaction of said Judgment.

Thomas A. Hamilton  
Thomas A. Hamilton

Sworn to and subscribed this 11th  
day of October A.D., 19 71

John F. Henderson  
Notary Public, Mobile County, ~~Clerk~~  
Alabama

FILED  
OCT 12 1971  
EUNICE B. BLACKMON CIRCUIT  
CLERK

No.....

**CIRCUIT COURT**

v/s.

**AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT**

Filed in Office,

19.....

Clerk.