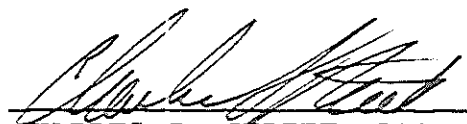


LIBERTY LOAN CORPORATION OF	X	IN THE CIRCUIT COURT OF
MOBILE, INC., a corporation,	X	BALDWIN COUNTY,
Plaintiff,	X	ALABAMA
VS:	X	AT LAW
JOHN SMITH and VIRGIE SMITH,	X	
separately and severally,	X	
Defendants.	X	CASE NO. 8402-1/2

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, the undersigned, a Notary Public in and for said State and County, personally appeared Charles S. Street, who made an oath in due form of law that Liberty Loan Corporation of Mobile, Inc., a corporation hath obtained a judgment against John Smith, Defendant in this cause, for the sum Three Hundred Fifty and no/100ths (\$350.00) Dollars, besides costs of suit, before the Circuit Court of Baldwin County, Alabama, and that the Grand Hotel of Point Clear, Baldwin County, Alabama, is supposed to be indebted or have effects of the said John Smith in its possession or under its control, and that Affiant believes the process of Garnishment is necessary against the said John Smith to obtain satisfaction of the said judgment.


 CHARLES S. STREET, Attorney

Subscribed and sworn to before me
 this 7th day of April, 1970.


 Notary Public, State of Alabama
 At Large

FILED

APR 10 1970

ALICE J. DUCK
 CLERK
 REGISTER

I do hereby certify that I have, on this 7th day of April, 1970, mailed this foregoing Garnishment Affidavit by Registered Mail, requesting return receipt to the Honorable Alice J. Duck, Clerk, Circuit Court of Baldwin County, Alabama, by posting the same Postage Prepaid and properly addressed in the United States Post Office, Mobile, Alabama.

LAW OFFICES

TYSON, MARR AND FRIEDLANDER

158 ST. LOUIS STREET • POST OFFICE BOX 1792

MOBILE, ALABAMA 36601

TELEPHONE 432-4354

JOHN M. TYSON
THOMAS M. MARR
MAURY FRIEDLANDER
CHARLES S. STREET
DAVID S. CONRAD
GARY P. ALIDOR
DONALD A. FRIEDLANDER

April 7, 1970

CERTIFIED MAIL

Honorable Alice J. Duck
Clerk, Circuit Court
Baldwin County Court House
BayMinette, Alabama 36507

Re: Liberty Loan Corporation, etc.
vs.
John Smith, et al
Case No. 8402
Garnishment Cs.# 8402-1/2

Dear Mrs. Duck:

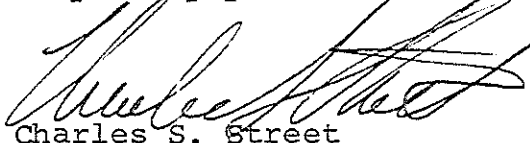
Reference is made to your conversation with Adelle Barron,
my secretary, of this date concerning the above styled cause.

Enclosed herewith please find a garnishment affidavit
executed by me and certified as to mailing on this date. We
would appreciate your prompt attention to this matter if at
all possible under your particular circumstances of being
without a secretary.

The Defendant's address is unknown, therefore, service
of his notice upon him will have to be made at the Grand Hotel,
Point Clear. The Defendant is a cook for the hotel.

Your assistance and cooperation in this matter is
greatly appreciated.

Very truly yours,


Charles S. Street

CSS:ab
Encl:1

May 31, 1971

Mr. Donald A. Friedlander
Attorney At Law
P.O. Box 1792
Mobile, Alabama 36601

RE: Liberty Loan Corp. of Mobile Inc.
vs John Smith & Virgie Smith
Case No. 8402½

Dear Donnie:

Enclosed please find a docket sheet for the Civil non-jury court calendar for Baldwin County, presently set for June 14, 1971. This is one of the cases I was handling when I was with Tyson Marr & Friedlander, which was previously dismissed a time or two for lack of prosecution, if my memory serves me correctly because the docket sheet did not reach me by the trial setting.

By copy of this letter, I am requesting the clerk of the court to substitute your name for mine as attorney of record for the plaintiff herein.

Very truly yours,


Charles S. Street

CSS/mls

cc: Eunice B. Blackmon
Circuit Clerk
Baldwin County
Bay Minette, Alabama 36507

Enclosure

GARNISHEE'S ANSWER
STATE OF ALABAMA, BALDWIN COUNTY

LIBERTY LOAN CORP. OF MOBILE, ALA.

Plaintiff,

CASE NO. 8402½

-vs-

JOHN SMITH

Defendant,

CIRCUIT COURT, BALDWIN COUNTY
BAY MINETTE, ALABAMA

GRAND HOTEL COMPANY,

Garnishee

Personally appeared before me, the undersigned Notary Public in and for Baldwin County, Alabama, Mr. H. L. Hendrix, who, on oath, answers to the Writ of Garnishment issued in this cause and served on Grand Hotel Company, the Garnishee, and says that he is duly authorized to make this answer, that he has knowledge of the facts stated herein, and that the said Garnishee is not indebted to the Defendant at the time of the service of this Garnishment or at the time of making this answer, and that the said Garnishee will be indebted in the future to the said Defendant by a contract existing at the time of the service of the Garnishment and making this answer, and that the said Garnishee has not in its possession or under its control, any personal or real property, or things in action belonging to said Defendant. The Garnishee further says that the Defendant, JOHN SMITH, is employed by it and works regularly. Garnishee further says that it will withhold 25% of all wages to become due from it to the Defendant in the future and will continue to do so until further orders of this Honorable Court.

H. L. Hendrix

GRAND HOTEL COMPANY

SUBSCRIBED and SWORN to before
me this 13 day of June 1970

Notary Public

Burke J. Duck

My Commission Expires: Dec 9, 1970

(AFFIX NOTARIAL SEAL)

ALICE J. DUCK
CLERK REGISTER

APR 14 1970

FILED

STATE OF ALABAMA

Baldwin County

TO John Smith and Virgie Smith, Defendant:

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

Liberty Loan Corporation of Mobile, Inc Plaintiff

versus John Smith and Virgie Smith Defendant

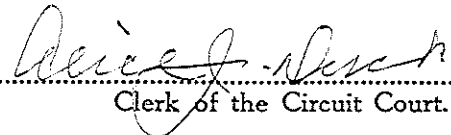
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

Grand Hotel, Point Clear, Ala

has been named as Garnishee.

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

8th day of Apr, 1970


Clerk of the Circuit Court.

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24 4-9-70

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 2 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 3.00
PROCESS(ES) OR A TOTAL OF \$ 11.00

80 miles
Point Clear, ALA.

Received 9 day of April 1970
and on 9 day of April 1970
I served a copy of the within Subpoena
on John & Virgie Smith

By service on John - Virgie Smith

TAYLOR WILKINS, Sheriff
By W. C. Craft D.S.

8402 1/2

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

Libert Loan Corp.
Plaintiff....

VS.

John Smith and
Virgie Smith
Defendant....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... May..... Term, 19..69....., of the Circuit Court of Baldwin County, to-wit: On the 14th..... day of May....., 19..69, being a regular day of said term, Liberty Loan Corporation of Mobile, Inc.....

recovered judgment against John Smith and Virgie Smith.....

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

..... Grand Hotel, Point Clear, Ala.....

has or is believed to have in their..... possession, or under their..... control money or effects belonging to said defendant ..John Smith and..... 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

..... Grand Hotel, Point Clear, Ala.....

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 service..... 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 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 ..John Smith and Virgie Smith.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this..... 8th..... day of April....., A. D., 19..70..

Issued 8th..... day of April..... A. D., 19..70..

ATTEST:

..... Alice J. Duck..... Clerk.

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 2 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 8.00
PROCESS(ES) OR A TOTAL OF \$ 11.00

80m by 11.00
Point Clear

Received 9 day of April 1930
and on 9 day of April 1930
I served a copy of the within Quit
on Grand Hotel
By service on Grand Hotel
TAYLOR WILKINS, Sheriff
By [Signature] D. S.

CIRCUIT COURT, BALDWIN COUNTY

No. 8402 $\frac{1}{2}$

LIBERTY LOAN CORPORATION OF MOBILE
a corp

VS. } GARNISHMENT ON JUDGMENT

JOHN SMITH and VIRGIE SMITH

Grand Hotel
Garnishee

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Charles Street
Attorney