

Our File No. 68-360

Your File No. _____

Law Offices

E. G. RICKARBY

35 SOUTH SECTION STREET

FAIRHOPE, ALABAMA 36532

CODE 205

Telephone: 928-9836

Mailing Address
P. O. BOX 471

August 15, 1969

Grady's Cut-Rate Cars, Inc.
1451 Davis Avenue
Mobile, Alabama

Dear Mr. Walker:

Inre: Grady's vs. Robert Oliver Watkins

We have settled this Watkins case in accordance with
your instructions and am herewith handing you check.

Yours very truly,

EGR/jlb

Encl.

cc: Mrs. Alice Duck

GRADY'S CUT RATE CARS, INC., : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS. : AT LAW
ROBERT OLIVER WATKINS, :
Defendant. : CASE NO. 8421 1/2

ORDER OF COURT

The motion of the defendant for a new trial in this case now coming on to be heard and submitted to the court, the court is of the opinion that said motion is well taken, it is, therefore,

Considered, ordered and adjudged by the court that the motion of the defendant to set aside the judgment rendered thereon and to grant the defendant a new trial, be and the said motion is hereby granted, the judgment rendered on is hereby set aside and the said defendant granted a new trial.

Telfair J. Mashburn
Honorable Telfair J. Mashburn
Judge of the Circuit Court
Baldwin County, Alabama

FILED

MAY 12 1969

ALICE J. BERRY CLERK
REGISTER

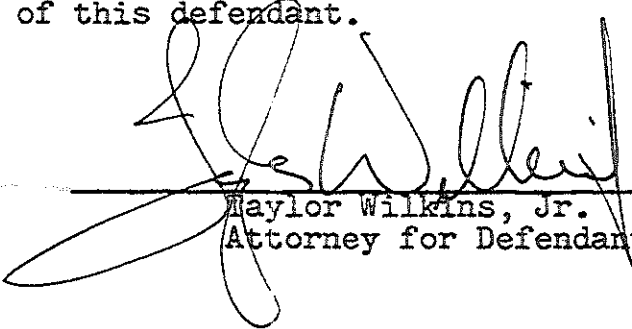
GRADY'S CUT RATE CARS, INC.,)	IN THE COURT OF GENERAL SESSIONS
)	
Plaintiff)	
)	OF MOBILE COUNTY, ALABAMA
vs)	
)	AT LAW
ROBERT OLIVER WATKINS,)	
)	NUMBER: 70404
Defendant.)	

PLEA IN ABATEMENT

Comes Robert Oliver Watkins, named as defendant in the above styled cause, for the special purpose of filing the following plea, separately to each count of the complaint in said cause, and for no other purpose:

The said Robert Oliver Watkins says that at the time said suit was instituted and at the time said cause of action arose he was a bona fide resident of the County of Baldwin, State of Alabama, and that the Court of General Sessions of Mobile County is without jurisdiction to try this suit.

Wherefore, Defendant says that the General Sessions Court of Mobile County is without jurisdiction of said suit and said cause of action and that the venue thereof is improperly laid in Mobile County, Alabama, and any suit based on the matters therein complained of, if brought in Alabama at all, should be filed and prosecuted in Baldwin County, Alabama, where the said Defendant has at all times and does now reside; and the Defendant prays that said action and said suit be abated by the Court and all of the allegations of this plea are verified by affidavit of Taylor Wilkins, Jr., on behalf of this defendant.


 Taylor Wilkins, Jr.
 Attorney for Defendant.

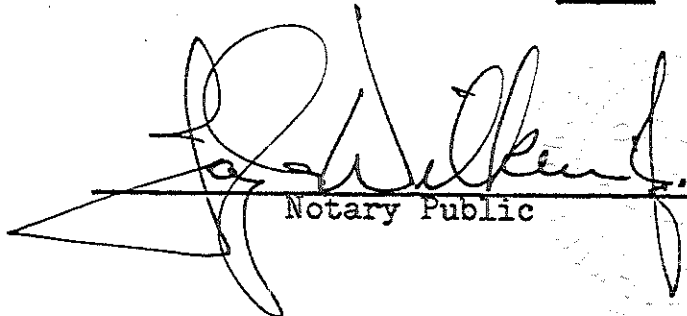
10/18/68

STATE OF ALABAMA

BALDWIN COUNTY

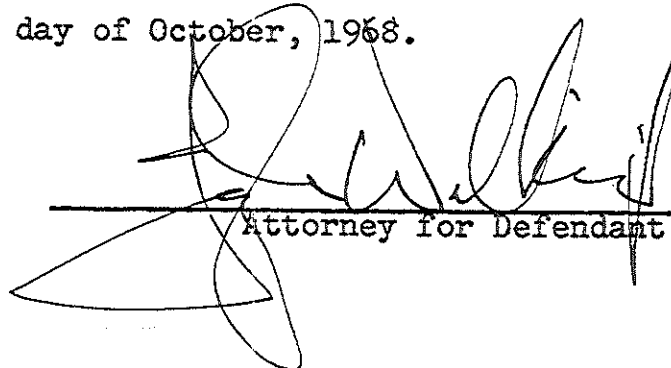
Before me, Taylor Wilkins, Jr., a Notary Public in and for said State and County, personally appeared Robert Oliver Watkins, who is known to me, and who, being duly sworn, says on oath that he has read the foregoing plea in abatement and that the matters set forth therein are true and that he is a resident of Baldwin County, Alabama, and is authorized to make this affidavit.

Sworn to and subscribed before me on this the 17th day of October, 1968.


Notary Public

I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have on this the 17th day of October, 1968, forwarded a true and exact copy of the foregoing plea in abatement to Mr. J. G. Bennett, 2 Macy Place, Mobile, Alabama, attorney of record for the Plaintiff, by mailing the same in the United States Post Office, properly addressed, with the postage paid thereon.

DONE this the 17th day of October, 1968.


Attorney for Defendant

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..... Term, 19...69... of the Circuit Court of Baldwin County, to-wit: On the ...7th... day of ...February... 19...69..., being a regular day of said term,GRADY'S CUT RATE CARS, INC., Plaintiff.....

recovered judgment against ...ROBERT OLIVER WATKINS, Defendant,.....

for the sum of ...THREE HUNDRED AND NO/100 (\$300.00)----- Dollars, and cost of suit, and affidavit having been made byE. G. RICKARDY..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

...THE GRAND HOTEL, Point Clear, Alabama.....

has or is believed to have inits..... possession, or underits..... control money or effects belonging to said defendant..... or thatit..... 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

...THE GRAND HOTEL.....

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...69..., 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 making...its.... answer, or at any time intervening the time of serving the garnishment, and making the answer...it.... was indebted to said defendant and whetherit..... will not be indebted in future to said defendant by a contract then existing, and whether by a contract then existingit..... 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 whetherit..... has not inits..... possession or underits..... control money or effects belonging to the defendant...ROBERT OLIVER WATKINS.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....20... day of ...Feb... A. D., 19...69.

Issued20... day of ...Feb... A. D., 19...69....

ATTEST:

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

CIRCUIT COURT, BALDWIN COUNTY

No. 842112

Received 20 day of June 1968
and on 24 day of Feb. 1969
served a copy of the within
on Edward Scott Defendant

By service of W. H. Henshaw
Undertaker

TAYLOR WILKINS, Sheriff
By Ray Randall D. S.

Point Clear 80

VS.

GARNISHMENT ON JUDGMENT

Wach's Life Rate Case
vs.

Robert Oliver Walters

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

E. H. TP
Attorney

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 2 PROCESS(S) AND
TRAVEL EXPENSE ON EACH OF \$ 8.00
PROCESS(S) OR A TOTAL OF \$ 16.00

GARNISHEE'S ANSWER
STATE OF ALABAMA, BALDWIN COUNTY

GRADY'S CUT RATE CARS, INC.,

Plaintiff,

-vs-

ROBERT OLIVER WATKINS,

Defendant,

GRAND HOTEL COMPANY,

Garnishee

CASE NO. 842 1/2

CIRCUIT COURT, BALDWIN COUNTY
BAY MINETTE, ALABAMA

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, Robert Oliver Watkins, 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
H. L. Hendrix

GRAND HOTEL COMPANY

SUBSCRIBED and SWORN to before
me this 25 day of Jan 1969.

Bernadine K. Goff
Notary Public

My Commission Expires: Dec. 9, 1970

(AFFIX NOTARIAL SEAL)

FILED

FEB 26 1969

ALICE J. BOEK CLERK
REGISTER



GRAND HOTEL *Point Clear, Alabama*

May 21, 1969

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama 36507

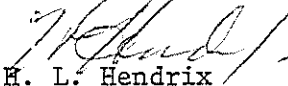
Dear Mrs. Duck:

We are enclosing our check in the amount of \$185.74 covering deductions from the earnings of Robert Oliver Watkins in payment of Garnishment No. 842½ for Grady's Cut Rate Cars, Inc.

Please acknowledge receipt and forward a release of this above garnishment.

Very truly yours,

Grand Hotel Comapny


E. L. Hendrix
Auditor

HLH:bk

Our File No. 68-360

Your File No. _____

Law Offices

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

CODE 205
Telephone: 928-9836

Mailing Address
P. O. BOX 471

February 17, 1969

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Grady's Cut-Rate Cars, Inc. vs. Robert Oliver Watkins

With this we are handing you Affidavit of Garnishment and Writ.

I have not got any Notices to Defendant. Would you send me down some? Please process, and oblige.

Yours very truly,



EGR/jlb
Encls.
2-24-69

STATE OF ALABAMA

Baldwin County

TO Robert Oliver Watkins, Defendant.....:

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

Grady's Cut Rate Cars, Inc, Plaintiff.....,

versus Robert Oliver Watkins, Defendant.....,

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

The Grand Hotel.....
has.... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the
20th day of Feb 19. 69

Clerk of the Circuit Court.

Blair J. Moore

342125-69

61 514

[illegible]

EGP

THE STATE OF ALABAMA
Baldwin County

Circuit Court

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State
aforesaid E. G. RICKABBY

who being duly sworn, on oath says, that a regular Term

of the Circuit Court of Baldwin County, to-wit: on the 7th day of February

1969, GRADY'S CUT-RATE CARS, INC., Plaintiff,

recovered a judgment against ROBERT OLIVER WATKINS, Defendant

..... for the sum of
THREE HUNDRED AND NO/100 (\$300.00) ----- Dollars

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

THE GRAND HOTEL, Point Clear, Alabama, is

supposed to be indebted to or have effects of the said ROBERT OLIVER WATKINS

in its possession, or under its Control, and that he believes process of

Garnishment against said GRAND HOTEL

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 17th

day of February A. D. 1969.

.....
N P Ala. at Large Clerk.

.....
.....

NO.

842-112

Circuit Court

GRADY'S CUT RATE CARS, INC.....

vs.

ROBERT OLIVER WATKINS.....

THE GRAND HOTEL, Garnishee

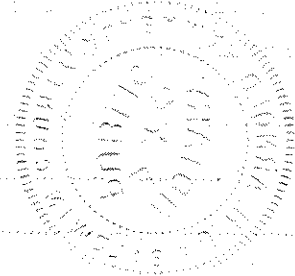
A F F I D A V I T
GARNISHMENT ON JUDGMENT

Filed this day of

....., 19.....

Clerk.

MOORE PRINTING CO. - BAY MINETTE, ALA.



RELEASE OF GARNISHMENT

CIRCUIT Court of BALDWIN County, Alabama

RE: GRADY'S CHEE RATE CARS, INC.

vs.

Plaintiff.

ROBERT OLIVER WATKINS

Defendant.

To: THE GRAND HOTEL, Garnishee

GARNISHEE

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that in the above styled case, Garnishment has been released and Garnishee has been discharged.

Witness my hand, this the 5th day of August, 1969

Alice J. Duck CLERK.