

BURTON H. SILVERSTEIN, d/b/a)
AAA ASSIGNMENT SERVICE, as)
Assignee of South Baldwin Hos-)
pital,)

Plaintiff,)

vs)

WILLIE LEE HOLMES,)

Defendant,)

vs)

PAUL KAISER FARMS,)

Garnishee)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

ANSWER OF GARNISHEE

Now comes PAUL KAISER FARMS, a partnership, the Garnishee in the above styled cause, by PAUL KAISER, a partner, who deposes and says that he is the duly authorized agent of the said Garnishee to make this answer; that he has personal knowledge of the facts herein and that for answer to the writ served on the Garnishee herein says:

That at the time the Garnishee was served with process of Garnishment in this cause the Defendant, WILLIE LEE HOLMES, was indebted to the Garnishee in the amount of SIXTY-FOUR AND NO/100 DOLLARS (\$64.00).

The Garnishee was not at the time of the service of said writ of garnishment, is not now, or will not in the future, by contract then or now existing, be indebted to the defendant in any sum; that said garnishee has not in its possession or under its control any money or effects belonging to defendant at any time from the date of the service of said writ until the time of the making of this answer.

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


PAUL KAISER FARMS

By Paul Kaiser Jr.
Paul Kaiser

Sworn to and subscribed before me by PAUL KAISER, as a partner of PAUL KAISER FARMS, located in Foley, Alabama on

C. G. C.

this the 5 day of May, 1969.



Notary Public, Baldwin County
State of Alabama

I hereby certify that I have mailed a copy of the above answer to Phyllis S. Nesbit, Attorney at Law, by placing the same, postage prepaid in the U. S. Post Office, Foley, Alabama, on this 6 day of May, 1969.



FILED

MAY 7 1969

ALICE J. DUCK CLERK
REGISTER

85-20 1/2

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 Phyllis S. Nesbit, attorney for Burton H. Silverstein who being duly sworn, on oath says, that a regular _____ Term of the Circuit Court of Baldwin County, to-wit: on the 17th day of February 19 69 Burton H. Silverstein, d/b/a AAA Assignment Service, as Assignee of South Baldwin Hospital recovered a judgment against Willie Lee Holmes

_____ for the sum of SIX HUNDRED NINE and 30/100 _____ Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that

Paul Kaiser Farms
Foley, Alabama

supposed to be indebted to or have effects of the said Willie Lee Holmes in its possession, or under its control, and that he believes process of Garnishment against said Paul Kaiser Farms is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 3rd day of April A. D. 19 69

Alice J. Duck
Clerk.

Phyllis S. Nesbit

STATE OF ALABAMA

Baldwin County

TO Willie Lee Holmes, Defendant:

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

Burton H. Silverstein, d/b/a AAA Assignment Service, Plaintiff,
as Assignee of South Baldwin Hospital
versus Willie Lee Holmes Defendant.

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

Paul Kaiser Farms, Foley, Alabama

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

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

3rd day of April, 1969

Alice J. Luck
Clerk of the Circuit Court.

Ex 4-21-69

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 17th day of February, 1969, being a regular day of said term, Burton H. Silverstein, d/b/a AAA Assignment Service, as Assignee of South Baldwin Hospital..... recovered judgment against Willie Lee Holmes

for the sum of SIX HUNDRED NINE and 30/100-----Dollars, and cost of suit, and affidavit having been made by Phyllis S. Nesbit that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

Paul Kaiser Farms
Foley, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Holmes 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

Paul Kaiser Farms

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 of this writ..... 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 whether it will not be indebted in future to said defendant 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 its has not in its possession or under its control money or effects belonging to the defendant Willie Lee Holmes.

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

Witness, ALICE J. DUCK, Clerk of said Court, this 3rd day of April, A. D., 1969

Issued 3rd day of April, A. D., 1969

ATTEST:

Alice J. Duck
Clerk.

B-8

CIRCUIT COURT, BALDWIN COUNTY

No. 8520 1/2

Burton H. Silverstein

VS. }

GARNISHMENT ON JUDGMENT

Willie Lee Holmes

Paul Kaiser Farms

Issued FILED 19__

Returnable APR 3 1969 day of 19__

ALICE J. DUCK CLERK
REGISTER

P. Nesbit

Attorney

Moore Printing Company, Bay Minette, Alabama

Received 21 day of April 1969
and on 21 day of April 1969
I received a copy of the writ 10-25 as
on Paul Kaiser Farms

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

TAYLOR WILKINS Sheriff

Childress D.S.

Childress