

*Law Offices of*  
**PERLOFF, REID & BRISKMAN**  
257 ST. ANTHONY STREET  
MOBILE, ALABAMA 36603

October 2, 1970

MAYER W. PERLOFF  
T. DWIGHT REID  
DONALD M. BRISKMAN

AREA CODE 205  
TELEPHONE 433-5412

Baldwin Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: American Plan vs. Jimmy & Sylvia Havranek Case # 8567 Cir. Ct.

Dear Sirs:

Please discharge the garnishee in the above styled cause.  
Attached please find a stamped, self-addressed envelope  
to send to garnishee at Baldwin National Bank of Robertsedale.

*a copy of the release*  
Very truly yours,

*T. Dwight Reid*  
T. Dwight Reid

/mm

## RELEASE OF GARNISHMENT

CIRCUIT

Court of

BALDWIN

County, Alabama

RE: AMERICAN PLAN CORPORATION OF ALABAMA, A Corp.

vs.

Plaintiff.

Jimmy & Sylvia Hammonet

Defendant.

To: BALDWIN NATIONAL BANK OF ROBERTSDALE, ALABAMA

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 15th day of October, 19 70

Alice J. Duck CLERK.

VOL

65

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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 April, 1969, being a regular day of said term, AMERICAN PLAN CORPORATION OF ALABAMA, a corp.....

recovered judgment against Jimmy Havranek & Sylvia Havranek, jointly & severally

for the sum of \$482.75, balance due at present \$234.75 Dollars, and cost of suit, and affidavit having been made by PERLOFF, REID & BRISKMAN that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

Baldwin National Bank of Robertsdale, Fairhope Branch checking account # 0567

has or is believed to have in its possession, or under its control money or effects belonging to said defendant S..... or that is, or is believed to be indebted to said defendant S..... 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

Baldwin National Bank of Robertsdale, Fairhope Branch

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 and whether it 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 it has not in its possession or under its control money or effects belonging to the defendant Jimmy & Sylvia Havranek

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

Witness, ALICE J. DUCK, Clerk of said Court, this 26 day of Aug, A. D., 1970

Issued 26 day of Aug, A. D., 1970

ATTEST

Alice J. Duck Clerk.

CIRCUIT COURT, BALDWIN COUNTY

No. 8567 1/2

American Plan Corp  
of Ala

VS. }

GARNISHMENT ON JUDGMENT

Jimmy & Sylvia Navramel

serve Baldwin Nat'l. Bk.  
of R'dale - Hope Branch  
Issued \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

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

T. Dwight Reid

Attorney

Moore Printing Company, Bay Minette, Alabama

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 2 PROCEEDINGS AND

TRAVEL EXPENSE ON EACH OF \$ 2.50

PROCEEDINGS ON A TOTAL OF \$ 27.50

Received 26 day of Aug 1970  
and on 28 day of Aug 1970  
I served a copy of the within sub  
on Baldwin Nat'l Bk (Bankrupt)

By service on Mr. Gene Tramm

TAYLOR WILKINS, Sheriff  
WOW  
D. S.

nonilor

92-4130

## STATE OF ALABAMA

Baldwin County

TO JIMMY & SYLVIA HAVRANEK  
....., Defendant...S.:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of..  
.....AMERICAN PLAN CORPORATION OF ALABAMA, a corporation....., Plaintiff.....  
versus .....JIMMY & SYLVIA HAVRANEK....., Defendant...S.....  
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which .....  
.....Baldwin National Bank of Robertsedale, Fairhope Branch.....  
ha.S.. been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 26  
.....day of Aug, 1970

Alice J. Luck  
.....  
Clerk of the Circuit Court.

8567 1/2

NOTICE  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA  
TO

Jimmy + Sylvia Harrack  
419 Barclay Ave -

American Plant Corp  
of Ala  
Plaintiff....

VS.

Jimmy + Sylvia Harrack  
1 Fairhope

Defendant....

Dwight Reid

Received 28 day of Aug 19 70  
and on 28 day of Aug 19 70

I served a copy of the within Notice  
on Jimmy + Sylvia Harrack

By service on

TAYLOR WILKINS, Sheriff  
By [Signature] D. S.

201 1/2 mi 58 1/2 70 + 70 = 140 140 miles

Case # 8567 1/2

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT

NOTARY PUBLIC, ALABAMA STATE AT LARGE

Personally appeared before me, ~~Alfred J. Buck, Clerk of the Circuit Court in and for Baldwin County and~~  
State aforesaid Perloff, Reid & Briskman

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

of the Circuit Court of Baldwin County, to-wit: on the 4th day of April

19 70, American Plan Corporation of Alabama, a corporation

recovered a judgment against Jimmy & Sylvia Havranek

\_\_\_\_\_ for the sum of

\$482.75 (less payments of \$248.00 - bal. due \$234.75) Dollars

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

Baldwin National Bank of Robertsdale, Fairhope Branch

Checking account #0567

supposed to be indebted to or have effects of the said Jimmy & Sylvia Havranek

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

Garnishment against said Jimmy & Sylvia Havranek

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 25th

day of August A. D. 19 70

Oliver L. Kramer  
Notary Public, Ala. State  
At Large

[Signature]

THE STATE OF ALABAMA  
Baldwin County

8567 1/2  
Circuit Court

the undersigned authority

Personally appeared before me, ~~Alfred X Duck, Clerk of the Circuit Court and for Baldwin County and State~~  
Perloff, Reid & Briskman  
aforesaid .....

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

of the Circuit Court of Baldwin County, to-wit: on the ..... 4th ..... day of ..... April .....

19 69, ..... American Plan Corporation of Alabama, a corporation, .....

recovered a judgment against ..... Jimmy Havranek .....

..... for the sum of  
\$482.75 less payments for balance due of \$169.50 ..... Dollars

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

Baldwin National Bank of Robertsedale  
Fairhope Branch  
Fairhope, Alabama .....

is  
supposed to be indebted to or have effects of the said ..... Jimmy Havranek .....

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

Garnishment against said ..... Baldwin National Bank of Robertsedale .....  
is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this ..... 19th .....

day of ..... July ..... A. D. 1971 .....

*Susan Nitcher*  
NOTARY PUBLIC

FILED

JUL 23 1971

FINICE B. BLACKMON  
CLERK

*Perloff Reid*



## STATE OF ALABAMA

Baldwin County

TO Jimmy Havranek, Defendant.....:

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

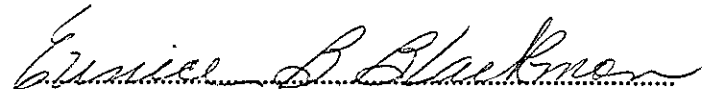
American Plan Corporation of Alabama, a corporation Plaintiff.....versus Jimmy Havranek Defendant.....

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

Baldwin National Bank of Robertsdale, Fairhope, Branch, Fairhope, Ala .....

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

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

23rd July  
.....day of ....., 19..71  
Clerk of the Circuit Court.

24-7-29-71

**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..... of the Circuit Court of Baldwin County, to-wit: On the 4th day of April, 1969, being a regular day of said term, American Plan Corporation of Alabama, a corporation

recovered judgment against Jimmy Havranek

~~\$481.75 less payments, balance due of~~  
 for the sum of One Hundred Sixty-nine and 50/100 \$169.50 Dollars, and cost of suit,

and affidavit having been made by T. Dwight Reid, 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:

Baldwin National Bank of Robertsdale, Fairhope Branch, Fairhope, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Jimmy Havranek 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 Baldwin National Bank of Robertsdale, Fairhope, Branch, & Fairhope, 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 Jimmy Havranek and whether it will not be indebted in future to said defendant Jimmy Havranek 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, Jimmy Havranek

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

Witness, Eunice B. Blackmon, Clerk of said Court, this 23rd day of July, A. D., 1971

Issued 23rd day of July, A. D., 1971

ATTEST

Eunice B. Blackmon Clerk

CIRCUIT COURT, BALDWIN COUNTY

No. 8567 1/2

AMERICAN PLAN CORPORATION OF ALA., A CORP.

VS. } GARNISHMENT ON JUDGMENT

JIMMY HAVRANEK

Baldwin National Bank of Robertsdale  
~~Fairhope Branch, Fairhope, Ala.~~

Issued 23rd day of July 19 71

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

T. Dwight Reid

Attorney

Moore Printing Co. - Bay Minette, Ala.

Received 26 day of July 19 71  
Received and on 28th day of July 19 71  
I served a copy of the within on Bald. Mgr. R.E. of Rade

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY Fred Seibert  
DEPUTY SHERIFF

By service on Fred Seibert, Sheriff

TAYLOR WILKINS, Sheriff  
By Fred Seibert, D. A.

F. Seibert

**Baldwin**

**NATIONAL**

**BANK** of *Robertsdale*

POST OFFICE DRAWER D • ROBERTSDALE, ALABAMA 36567

ROBERT I. GULLEDGE  
PRESIDENT

TELEPHONE 947-2492

July 30, 1971

*American Plan Corp.  
of Ala. vs. Jimmy Havrenek  
#8567 1/2*

Circuit Court  
Baldwin County, Alabama  
% Mrs. Eunice B. Blackmon  
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

In reply to your Summons dated the 23rd day of July, 1971, concerning one Jimmy Havrenek. This letter is to inform you that this bank no longer has an account with this subject nor do we hold any personal property or money belonging to this individual. We are indebted in no way to Mr. Havrenek.

If we may be of further assistance in this matter, please let us know.

Sincerely,

*Richard S. Fountain*  
Richard S. Fountain  
Cashier

RSF/lrs

Enclosure

**FILED**

**AUG 3 1971**

**EUNICE B. BLACKMON** CIRCUIT  
CLERK