

no. 8744

FILED

JUN 5 1969

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA, AT LAW

CASE NO. 28205

ALICE J. BUCK  
CLERK  
REGISTER

\*\*\*\*\*

McDERMOTT & SLEPIAN  
BY: Edward B. McDermott

SEABOARD ACCEPTANCE COMPANY, a corporation

N.J.

VS. Suit for \$1,420.26 with interest due by promissory  
note Atty's fee \$284.00 (WAIVER)

TAYLOR D. WILKINS, JR.  
P.O. Box 61  
Bay Minette, Ala. 36507

JOHN E. SALTER and KATHERINE SALTER

N.J.

\*\*\*\*\*

PLEADINGS, PROCESS, ETC, \* FILING DATE \*  
\* \* \* \* \*  
1. Complaint & Summons \* 4-10-69 \*  
2. Plea In Abatement \* 5-5-69 \*  
3. Demurrer (Pltff.) \* 5-26-69 \*  
\* \* \* \* \*

C & S served on Defendants on April 21, 1969.

Plaintiff's demurrer filed May 26, 1969 to the Defendants' Plea in Abatement.  
May 30, 1969 - Demurrer overruled. /s/ W.G.C., Jr. 39-140

May 30, 1969 - Plea in Abatement sustained, and case transferred to Baldwin  
County, Alabama for further proceedings. /s/ W.G.C., Jr. 39-140

66 PAGE 549  
66  
TOTAL

I, JOHN E. MANDEVILLE, in my capacity as Clerk of the Circuit Court of Mobile County, Alabama, hereby certify that the above is a true and correct transcript of all the minutes, orders and other proceedings in the above styled case in this Court.

In Witness whereof I have hereunto set my hand and attached my Official Seal as such Clerk of said Court at Mobile, Mobile County, Alabama, on this the 30th day of May 19 69.

*John E. Mandeville* Clerk

SEABOARD ACCEPTANCE : IN THE CIRCUIT COURT  
COMPANY, a corporation,  
  
Plaintiff, : OF MOBILE COUNTY,  
  
VS: : ALABAMA - AT LAW  
  
JOHN E. SALTER and KATHERINE :  
SALTER,  
  
Defendants. : CASE NO. 28205

COUNT ONE

The Plaintiff claims of the Defendants, individually and jointly, the sum of, to-wit: ONE THOUSAND FOUR HUNDRED TWENTY AND 26/100 (\$1,420.26) DOLLARS with interest thereon, balance due by promissory note made by the Defendants on, to-wit: December 23, 1965, and payable in thirty-six (36) consecutive monthly installments beginning on, to-wit: February 5, 1966. Plaintiff further alleges that in said note, and as part of the consideration thereof, the Defendants agreed that in the event of default in the payment of any of the said installments when due, the holder of the said note shall have the right to declare the entire indebtedness immediately due and payable, and the Plaintiff alleges that there has been a default in the payment of said installments, and the Plaintiff has elected to declare the entire indebtedness due and payable.

The Plaintiff further alleges that in said note and as part of the consideration thereof, the Defendants waived all right of exemptions under the Constitution and laws of the State and Alabama, and agreed to pay all costs of collection or securing or attempting to collect or secure said note, including a reasonable attorney's fee, which such attorney's fee the Plaintiff claims and alleges to be, to-wit: TWO HUNDRED EIGHTY FOUR AND NO/100 (\$284.00) DOLLARS.

McDERMOTT & SLEPIAN  
Attorneys for Plaintiff

By: Edward B. McDermott  
EDWARD B. McDERMOTT

Defendants may be served:

1704 Hand Street  
Bay Minette, Alabama

STATE OF ALA. MOBILE CO.  
I CERTIFY THIS PLEADING  
WAS FILED ON

APR 10 9 45 AM '69

VOL 66 PAGE 551

John H. Mansell  
CLERK

**THE STATE OF ALABAMA**  
MOBILE COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama:  
You are hereby commanded to summon

JOHN E. SALTER and KATHERINE SALTER

to appear within thirty days from service of this process, in the Circuit Court of Mobile County, Alabama,  
at the place of holding the same, then and there to answer the complaint of  
SEABOARD ACCEPTANCE COMPANY, a corporation

WITNESS: John E. Mandeville, Clerk of said Court, this 10th day of April, 1969

Attest: *John E. Mandeville*  
Clerk

**SHERIFF'S RETURN**

Received \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_ and on \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, I served a copy of \_\_\_\_\_  
the within \_\_\_\_\_ on \_\_\_\_\_  
by service on \_\_\_\_\_

RAY D. BRIDGES, SHERIFF

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

66 APR 552

4-21-69 24

Received 16 day of April 1969  
and on 21 day of April 1969  
I served a copy of the within etc on  
John E. Salter & Katherine  
Salter  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Salter S.S.

APR 21 4 31 PM '69  
BY \_\_\_\_\_

*mail*  
No. 28205 - C

JUDGE \_\_\_\_\_ DOCKET

CIVIL DIVISION

**CIRCUIT COURT**  
MOBILE COUNTY

Seaboard Acceptance Company,  
etc.

VS. } Complaint and Summons

John E. Salter and Katherine  
Salter

Issued 10th day of April, 19 69

Defendant's Address  
  
1704 Hand Street  
Bay Minette, Alabama

EDWARD B. McDERMOTT  
Plaintiff's Attorney

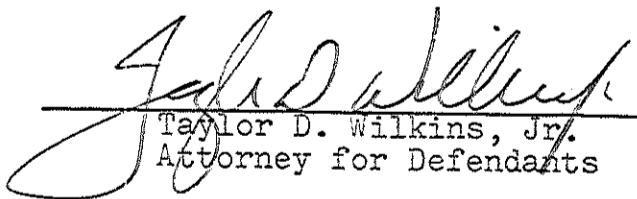
SEABOARD ACCEPTANCE	:	IN THE CIRCUIT COURT
COMPANY, a corporation,	:	
Plaintiff,	:	OF MOBILE COUNTY,
VS.	:	ALABAMA - AT LAW
JOHN E. SALTER and	:	
KATHERINE SALTER,	:	
Defendants.	:	CASE NO. 28205 - C

PLEA IN ABATEMENT

Come now John E. Salter and Katherine Salter, defendants, in the above styled cause, by their attorney, Taylor D. Wilkins, Jr., and appearing specially for the purpose of filing the following plea in abatement, and for no other purpose, pleas in abatement to the complaints filed in this cause and to each count thereof as follows, separately and severally:

1. That this Honorable Court is without jurisdiction of the cause of action sued on in that the defendants, John E. Salter and Katherine Salter, are bona fide residents of Baldwin County, Alabama, and they do not reside in Mobile County, Alabama.

WHEREFORE, the defendants say they cannot be sued in Mobile County, Alabama, and that the Circuit Court of Mobile County, Alabama, has no jurisdiction of the cause of action made the basis of this suit and that this court ought not to take further jurisdiction of this cause.

  
 Taylor D. Wilkins, Jr.  
 Attorney for Defendants

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Taylor D. Wilkins, Jr., a notary public for the State at large, personally appeared John E. Salter and Katherine Salter, who, being by me first duly sworn, deposes and say that they are the defendants in the above styled cause and they are cognizant of the facts stated in the above and foregoing plea in abatement and that the facts stated therein are true to the best of their knowledge, information and belief.

John E. Salter  
John E. Salter

Katherine Salter  
Katherine Salter

Sworn to and subscribed to before me this 1 day of May, 1969.

Taylor D. Wilkins, Jr.  
Taylor D. Wilkins, Jr.  
Notary Public

I certify that I have on this 2nd day of May, 1969, forwarded a true and exact copy of the foregoing plea in abatement to Mr. Edward B. McDermott, First National Bank Building, Mobile, Alabama, Attorney for Plaintiff, by mailing the same in the United States Post Office, properly addressed, with the postage paid thereon.

Done this the 2nd day of May, 1969.

Taylor D. Wilkins, Jr.  
Taylor D. Wilkins, Jr.  
Attorney for Defendants

STATE OF ALA. MOBILE CO.  
I CERTIFY THIS PLEADING  
WAS FILED ON

MAY 5 8 13 AM '69

EVOL 66 PAGE 554

Paul M. Maudselle  
CLERK

SEABOARD ACCEPTANCE	:	IN THE CIRCUIT COURT
COMPANY, a corporation,		
Plaintiff,	:	OF MOBILE COUNTY,
VS:	:	ALABAMA - AT LAW
JOHN E. SALTER, and	:	
KATHERINE SALTER,		
Defendants.	:	CASE NUMBER <u>28,205</u> - C

D E M U R R E R

Comes now the Plaintiff in the above styled cause and demurs to the Plea in Abatement heretofore filed by the Defendants and for grounds sets forth the following, separately and severally:

1. For that the allegations of said Plea are insufficient to abate this cause of action.
  
2. For that the Circuit Court of Mobile County, Alabama, is a court of general jurisdiction and has jurisdiction over ex-contractu actions and it further affirmatively appears that the Defendants have been personally served within the State of Alabama.
  
3. For that the said Plea attempts to abate this action because the Defendants are non-residents of Mobile County and therefore this Court is without subject matter jurisdiction of this cause. For that said Plea is attempting to allege that because the Defendants are non-resident citizens of Mobile County, that this Court is without subject matter jurisdiction of this cause.
  
4. For that by alleging that this Court is without jurisdiction or without subject matter jurisdiction of this cause, the Defendants have made a general appearance and have waived improper

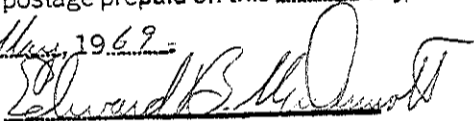
venue, if any there is, in this cause.

McDERMOTT & SLEPIAN  
Attorneys for Plaintiff

By:   
EDWARD B. McDERMOTT

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing  
pleading has been served upon counsel  
for all parties to this proceeding, by  
mailing the same to each by First Class  
United States Mail, properly addressed  
and postage prepaid on this 29<sup>TH</sup> day  
of May, 1969.



STATE OF ALA. MOBILE CO.  
I CERTIFY THIS PLEADING  
WAS FILED ON

MAY 26 4 38 PM '69

  
CLERK

FRIDAY, MAY 30, 1969

SEABOARD ACCEPTANCE COMPANY	)		
a corp.	)		PLAINTIFF'S DEMURRER FILED MAY
	)		26, 1969 TO DEFENDANTS' PLEA IN
CAFFEY	)	28205	ABATEMENT- DEMURRER OVERRULED.
-vs-	)		
JOHN E. SALTER, et al	)		

This day in open Court came the parties by their attorneys, and plaintiff's demurrer filed May 26, 1969, to defendants' Plea in Abatement in this cause, coming on to be heard and being argued by counsel and understood by the Court;

It is ordered and adjudged by the Court that plaintiff's said demurrer filed May 26, 1969 to defendants' Plea in Abatement in this cause be, and the same is hereby overruled.

Minute Book 39

Page 140

FRIDAY, MAY 30, 1969

SEABOARD ACCEPTANCE COMPANY,  
a Corp.

CAFFEY            -vs-            28205

JOHN E. SALTER & KATHERINE  
SALTER

PLEA IN ABATEMENT SUSTAINED,  
AND CASE TRANSFERRED TO BALDWIN  
COUNTY, ALABAMA, FOR FURTHER  
PROCEEDINGS

This day in open Court came the parties by their attorneys, and defendants' Plea in Abatement filed May 5, 1969, in this cause, coming on to be heard and being argued by counsel and understood by the Court;

It is ordered and adjudged by the Court that defendants' said Plea in Abatement filed May 5, 1969, in this cause be, and the same is hereby sustained, and case ordered transferred to the Circuit Court of Baldwin County, Alabama, for further proceedings.

Minute Book 39

Page 140

STATE OF ALABAMA, }  
COUNTY OF MOBILE }

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

I, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, do hereby  
certify that the foregoing is a full, true and correct copy of

ORDER OF COURT

as rendered by the said Circuit Court on the 30th day of May, 19 69, in the cause  
entitled No. 28205 - SEABOARD ACCEPTANCE COMPANY, a Corporation

— versus — JOHN E. SALTER & KATHERINE SALTER  
Plaintiff,

Defendant, (together with the same and the same remains of record in this office in  
Minute Book No. 39, Page No. 140

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Court at office  
in the City of Mobile, Alabama, on this the 30th day of May, 19 69.

ATTEST:

*John E. Mandeville*  
Clerk, Circuit Court, Mobile County, Alabama.

CIVIL DIVISION, CIRCUIT COURT, MOBILE COUNTY

SEABOARD ACCEPTANCE COMPANY, a corporation

Plaintiff

No. 28205

VS.

JOHN E. SALTER and KATHERINE SALTER

Defendant

## BILL OF COST

(Act No. 740, Reg. Session Ala. Legislature 1957  
Appvd. Sept. 20, 1957)  
(Amend Sec. 21, Title 11, Code Ala. 1940)

(Act No. 571, Reg. Ses. Leg. 1955)  
(Amend Sec. 34 and 100, Title 11, Code Ala. 1940)

CLERK'S FEES		Pltff.	Deft.	SHERIFF'S FEES		Pltff.	Deft.
Suits for \$100 or less .....	\$ 6.00			Serving Summons & Complaint <u>2</u> .....	\$ 1.50	3	00
Suits for over \$100 but less than \$1,000 .....	10.00			Serving Writ of Garnishment .....	1.50		
Suits for \$1,000 and over .....	20.00	20	00	Serving Sci Fa.-Notices .....	1.50		
Suits in detinue, ejectment, etc. ....	10.00			Levying Attachment & Return .....	6.25		
Suits not otherwise provided .....	10.00			Executing Writ Possession .....	5.00		
Writs, Mandamus, Prohibition, etc. ....	15.00			Seizing personal property under Writ of Detinue .....	6.00		
Appeals from Court General Sessions .....	15.00			Serving subpoenas, each .....	.75		
Appeals from Probate Court .....	20.00			Impanelling Jury .....	.75		
Appeals from JP Courts .....	6.00			Taking & Approving Bond .....	2.00		
Appeals from State Dept of Pub. Safety, and other State Agencies .....	10.00			Collecting Costs Execution .....	1.50		
Workmen's Compensation Settle. ....	10.00			Serving Contempt Writ .....	1.50		
Garnishment on Judgment .....	6.00			Making Deed for Property sold .....	2.50		
Order of Sale, Motions to sell. ....	6.00			Commission, collecting money on executions, 1st \$200 5%; \$200 to \$500 4%; over \$500 3% \$			
Recording executions from State Agencies .....	3.00			.....	\$		
Cert. Copy of Record - per 100 words .....	.15	80		Total .....	\$	3	00
Taking Appeal Bond .....	.75						
Record for Supreme Court etc., per 100 words .....	.15						
Add'l Copies of Record for Supreme Court, per 100 words .....	.05						
Checking - including Reporters Transcript of Evidence .....	10.00						
Certifying Abstract in lieu of Transcript on Appeal .....	5.00						
Collecting Money on Judgments over 30 days old, ½ the per- centage allowed Sheriffs .....	\$						
	\$						
Total .....	\$	20	80				

RECAPITULATION		Pltff.	Deft.
Clerk .....		20	80
Sheriff .....		3	00
Inferior Civil Court .....			
Justice Peace fees .....			
Witness fees .....			
Commissioner's fees .....			
Certificate of Judgment .....			
Judgment .....			
10% Damages .....			
Interest .....			
Stenographer's fees (\$10.00 Day) .....			
Library fee .....	1.50	1	50
Trial Tax (County) .....	1.50	1	50
Trial Tax (State) .....	1.50	1	50
Advertisement .....			
Garnishee's fees .....			

I respectfully beg to advise that if this bill for costs is not paid before \_\_\_\_\_ 19\_\_\_\_\_, it will be my unpleasant duty to issue execution for same.

JOHN E. MANDEVILLE, Clerk

\$28.30

McDERMOTT AND DEAS  
ATTORNEYS AT LAW  
301 SAINT JOSEPH STREET  
MOBILE, ALABAMA 36601

EDWARD B. McDERMOTT  
THOMAS A. DEAS

P. O. Box 2301  
433-1806

September 11, 1975

Mrs. Eunice Blackmon  
Circuit Clerk  
Baldwin County Court House  
Bay Minette, Alabama 36507

Re: John E. Salter  
Recording No. 8744

Dear Mrs. Blackmon:

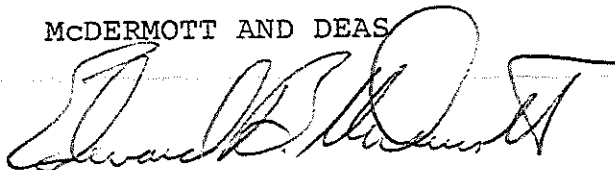
Mr. Salter has contacted me again with reference to a cancellation of the above judgment.

On May 2, 1975, I wrote to Mr. Taylor Wilkins and enclosed a corporate cancellation and asked that he record same in the Probate Court of Baldwin County as he represents Mr. Salter.

I am enclosing a copy of this cancellation and I would appreciate it if this judgment could be cancelled. If you should have any questions, please let me know.

Very truly yours,

McDERMOTT AND DEAS

  
Edward B. McDermott

EBMcD:gs  
Enclosure

cost \$57.<sup>30</sup>

10.62812-964-2292

## CORPORATE CANCELLATION

STATE OF ALABAMA,  
COUNTY OF ~~MOBILE~~ BALDWIN;

The debt secured by \_\_\_\_\_ recorded in \_\_\_\_\_ Book \_\_\_\_\_, Page \_\_\_\_\_ of  
the Records in the office of the Judge of Probate of ~~Mobile~~ Baldwin County, Alabama, from \_\_\_\_\_  
John E. Salter \_\_\_\_\_ to Seaboard Acceptance Company \_\_\_\_\_;  
having been paid in full, said lien is hereby fully cancelled, this May 2 1975  
Month Date Year

SEABOARD ACCEPTANCE COMPANY

By: \_\_\_\_\_ (SEAL)  
Edward B. McDermott, Its attorney

STATE OF ALABAMA,  
COUNTY OF MOBILE.

I, Helen Simpson \_\_\_\_\_, a Notary Public, in and for said County and State,  
do hereby certify that Edward B. McDermott \_\_\_\_\_  
whose name as attorney \_\_\_\_\_ of the Seaboard Acceptance Company \_\_\_\_\_, a Cor-  
poration, is signed to the foregoing release and cancellation, and who is known to me, acknowledged  
before me on this day, that being informed of the contents of said instrument, he as such officer  
and with full authority, executed the same voluntarily for and as the act of said corporation, on the  
day the same bears date.

Given under my hand and seal this May 2 1975  
Month Date Year

NOTARY PUBLIC, MOBILE COUNTY ALABAMA

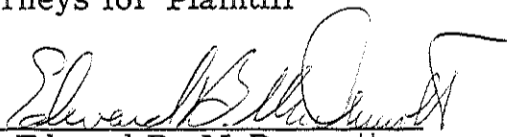
SEABOARD ACCEPTANCE	:	IN THE CIRCUIT COURT
COMPANY, a corporation,		
Plaintiff,	:	OF BALDWIN COUNTY,
VS:	:	ALABAMA
JOHN E. SALTER and KATHERINE	:	AT LAW
SALTER,		
Defendants.	:	CASE NUMBER _____

MOTION TO STRIKE JURY DEMAND

Comes now the Plaintiff in the above styled cause and moves this Honorable Court to strike the demand for a jury trial heretofore filed by the Defendants and for grounds sets forth the following, separately and severally:

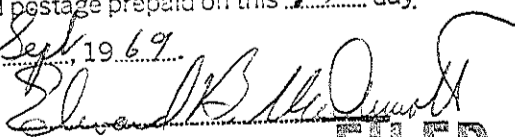
1. For it affirmatively appears that the demand for jury trial was not filed within thirty (30) days from the date of service of process on the Defendants.
2. For that as a matter of law the Defendants are not entitled to a trial by jury.

McDERMOTT & SLEPIAN  
Attorneys for Plaintiff

By:   
Edward B. McDermott

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 19<sup>th</sup> day of Sept, 1969.



**FILED**

SEP 23 1969

**ALICE J. DUCK** CLERK  
REGISTER

SEABOARD ACCEPTANCE  
COMPANY, a corporation

PLAINTIFF,

VS.

JOHN E. SALTER and  
KATHERINE SALTER,

DEFENDANTS.

: IN THE CIRCUIT COURT OF

:  
: BALDWIN COUNTY, ALABAMA

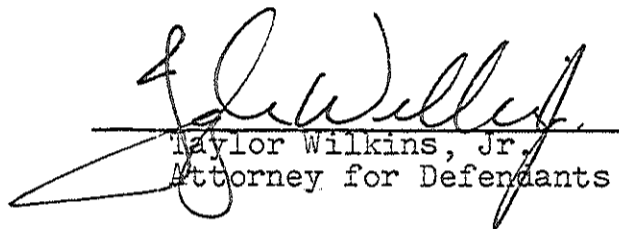
:  
: AT LAW

: CASE NO: 8744

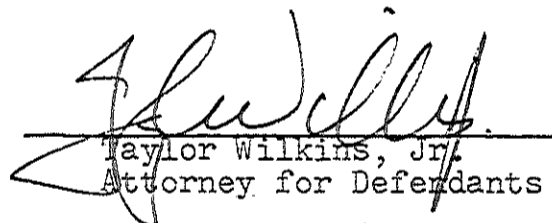
D E M U R R E R

Comes now the Defendants in the above styled cause and files this demurrer to the plaintiff's complaint and set down and assign the following grounds separately and severally.

1. The Plaintiff has failed to state a cause of action in his complaint.

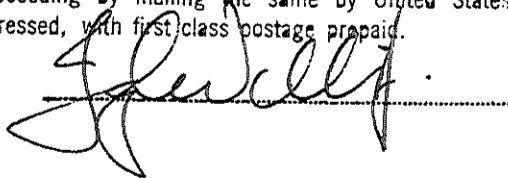
  
Taylor Wilkins, Jr.  
Attorney for Defendants

Defendants respectively demands a trial of this cause by jury.

  
Taylor Wilkins, Jr.  
Attorney for Defendants

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this 2 day of September  
1969 served a copy of the foregoing pleading on counsel for all  
parties to this proceeding by mailing the same by United States  
Mail, properly addressed, with first class postage prepaid.



**FILED**

SEP 2 1969

**ALICE J. DUCK** CLERK  
REGISTER

SEABOARD ACCEPTANCE  
COMPANY, a corporation

Plaintiff,

VS:

JOHN E. SALTER and KATHERINE  
SALTER,

Defendants.

\* IN THE CIRCUIT COURT  
\* OF BALDWIN COUNTY,  
\* ALABAMA  
\* AT LAW  
\*  
\* CASE NO 8744

MOTION TO WITHDRAW

Comes now McDERMOTT AND SLEPIAN, attorneys of record for the Plaintiff in the foregoing cause, and shows unto the Court that EDWARD B. McDERMOTT is no longer a member of this firm, but will continue to represent the Plaintiff as attorney of record.

THE PREMISES CONSIDERED, the court is moved to enter an order allowing McDERMOTT AND SLEPIAN, to withdraw as attorneys of record effectively immediately.

McDERMOTT AND SLEPIAN

BY: 

CERTIFICATE OF SERVICE

I, EDWARD B. McDERMOTT do hereby certify that I have served a copy of the foregoing motion to withdraw on Defendant's attorney of record, TAYLOR D. WILKINS, JR., by handing a true copy thereof to him on the 11th day of January, 1971.

  
EDWARD B. McDERMOTT

1-11-71 motion granted. Jeffrey G. Masburn judge.

FILED

JAN 13 1971

SEABOARD ACCEPTANCE  
COMPANY, a corporation,  
Plaintiff,

-VS-

JOHN E. SALTER,

Defendant,

ALABAMA DRY DOCK AND  
SHIPBUILDING COMPANY,  
a corporation,

Garnishee.

\*

\*

\*

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\*

\*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

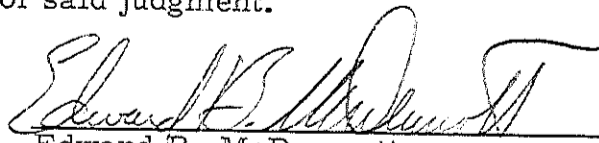
AT LAW

CASE NO:


8744 1/2

AFFIDAVIT FOR GARNISHMENT ON JUDGMENT

Personally appeared before me, the undersigned authority, in and for said County in said State, Edward B. McDermott, who being by me first duly sworn, on oath says that on the 9th day of March, 1971, in the Circuit Court of Baldwin County, Alabama, in case No. 8744 the Plaintiff Seaboard Acceptance Company, a corporation, recovered a judgment against John E. Salter the defendant, whose address is 1704 Hand Street, Bay Minette, Alabama for the sum of ONE THOUSAND (\$1,000.00) DOLLARS, besides costs of suit and that said judgment remains wholly unsatisfied and is in full force and effect; that Alabama Drydock and Shipbuilding Company, a corporation whose address is Pinto Island, Mobile County, Alabama, is suppose to be indebted to or to have the effects of the said John E. Salter in its possession or under its control and that he believes process of garnishment against the said Alabama Drydock and Shipbuilding Company, a corporation, is necessary to obtain satisfaction of said judgment.

  
Edward B. McDermott

Sworn to and subscribed before me on this 4th day of April, 1971.

  
NOTARY PUBLIC, STATE OF ALABAMA  
AT LARGE

**FILED**

APR 15 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

VOL

67

PAGE 186

## RELEASE OF GARNISHMENT

CIRCUIT Court of BALDWIN County, Alabama

RE: SEABOARD ACCEPTANCE COMPANY, A Corporation

vs.

Plaintiff.

JOHN E. SALTER

Defendant.

To: ALABAMA DRY DOCK & SHIPBUILDING COMPANY

GARNISHEE

I, Eunice B. Blackmon, 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 30th day of April, 19 71

Eunice B. Blackmon CLERK.

SEABOARD ACCEPTANCE  
COMPANY, a corporation,  
Plaintiff,

\*

IN THE CIRCUIT COURT OF

\*

BALDWIN COUNTY, ALABAMA

-VS-

\*

AT LAW

JOHN E. SALTER,

\*

Defendant,

\*

ALABAMA DRY DOCK AND  
SHIPBUILDING COMPANY,  
a corporation,

\*

\*

Garnishee.

\*

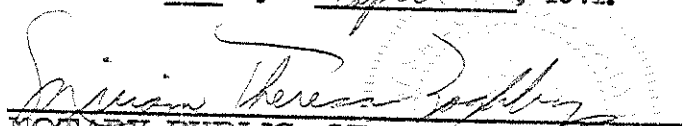
CASE NO: \_\_\_\_\_

AFFIDAVIT FOR GARNISHMENT ON JUDGMENT

Personally appeared before me, the undersigned authority, in and for said County in said State, Edward B. McDermott, who being by me first duly sworn, on oath says that on the 9th day of March, 1971, in the Circuit Court of Baldwin County, Alabama, in case No. 8744 the Plaintiff Seaboard Acceptance Company, a corporation, recovered a judgment against John E. Salter the defendant, whose address is 1704 Hand Street, Bay Minette, Alabama for the sum of ONE THOUSAND (\$1,000.00) DOLLARS, besides costs of suit and that said judgment remains wholly unsatisfied and is in full force and effect; that Alabama Drydock and Shipbuilding Company, a corporation whose address is Pinto Island, Mobile County, Alabama, is suppose to be indebted to or to have the effects of the said John E. Salter in its possession or under its control and that he believes process of garnishment against the said Alabama Drydock and Shipbuilding Company, a corporation, is necessary to obtain satisfaction of said judgment.

  
Edward B. McDermott

Sworn to and subscribed before me on this 10th day of April, 1971.

  
NOTARY PUBLIC, STATE OF ALABAMA  
AT LARGE