

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 18th day of December, 1969, being a regular day of said term, First Gulf Shores Corporation

recovered judgment against M. Gene Brown

for the sum of FOUR HUNDRED EIGHT and 34/100-----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:

Leon W. Avera

Mobile, Alabama

has or is believed to have in his possession, or under his control money or effects belonging to said defendant Brown or that he 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

Leon W. Avera

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. 1970, then and there within the three first days of the Monday in A. D. 1970 the service of the garnishment, or at the making his answer, or at any time intervening the time of serving the garnishment, and making the answer he was indebted to said defendant and whether will not be indebted in future to said defendant by a contract then existing, and whether by a contract then existing he is, or are, liable to said defendant's 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 he has not in his possession or under his control money or effects belonging to the defendant M. Gene Brown

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

Witness, ALICE J. DUCK, Clerk of said Court, this 12 day of Feb, A. D., 1970

Issued 12 day of Feb A. D., 1970

ATTEST:

Alice J. Duck, Clerk.

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

Received 12 day of September 1976
and on 13 day of Sept 1976
I served a copy of the within writ
on Henry W. Davis
By service on _____

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

CIRCUIT COURT, BALDWIN COUNTY

No. 8954 1/2

First Gulf Shores Corp

VS. } GARNISHMENT ON JUDGMENT

M. Gene Brown

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

nechet
Attorney

[Faint, mostly illegible text from the reverse side of the document, including a large signature and various handwritten notes.]

THE STATE OF ALABAMA,
BALDWIN COUNTY

8754 1/2
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 First Gulf Shores Corp.

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

of the Circuit Court of Baldwin County, to-wit: on the 18th day of December

19 70, First Gulf Shores Corp.

recovered a judgment against M. Gene Brown

_____ for the sum of

FOUR HUNDRED EIGHT AND 34/100 _____ Dollars

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
Leon W. Avera, Foley, Alabama

supposed to be indebted to or have effects of the said M. Gene Brown

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

Garnishment against said Leon W. Avera

is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 12

day of Feb A. D. 19 70

Alice J. Duck
Clerk.

Phyllis S. Nesbit

NO. _____

CIRCUIT COURT

VS.

AFFIDAVIT Garnishment on Judgment

Filed this _____ day of

19____

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

TO M. Gene Brown, Defendant.....:

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

First Gulf Shores Corporation, Plaintiff.....

versus M. Gene Brown, Defendant.....

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

Leon W. Avera, Foley, Alabama

has^s been named as Garnishee.....

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

17th day of July, 1970.....Alice J. Dush
Clerk of the Circuit Court.

Received 12 day of January 1920
and on 13 day of Jan 1920
I served a copy of the within Notice
on Mr. Gene Brown
By service on _____

TAYLOR WILKINS, Sheriff
By W. L. Wilkins D. S.

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
BY W. L. Wilkins TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

8754 1/2

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

First Gulf Shore Corp.

Plaintiff....

VS.

Mr. Gene Brown

Defendant....

W. L. Wilkins

AVERA FARMS

Growers Of Seeds
Potatoes - Soybeans

R. Route 1 Box 85-A - Telephone WH 3-6457

Foley, Alabama

Feb 21

1970

Mr. J. Duck

Enclosed is a check endorsed by Gene Brown
for \$1750 which is 25% of his weekly earnings.
If there is not the correct procedure please
let me know the right way as I am
new at this kind of business.

Sincerely
Leon W. Avera