

4869

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

EDWARD D. O'CONNOR, Complainant

vs.

GENEVIEVE T. O'CONNOR, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said

EDWARD D. O'CONNOR is forever divorced from the said GENEVIEVE T. O'CONNOR for and on account of

Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that custody and control of Barbara Jean O'Connor, 16 years of age, who is a child of this marriage, be and the same is hereby reposed in the Complainant, Edward D. O'Connor, with rights of reasonable visitation to the Respondent. IT IS FURTHER ORDERED, ADJUDGED and DECREED by the Court that custody and control of the two minor boys of this marriage, nemely, Edward D. O'Connor, Jr., 12 years of age, and Steven J. O'Connor 10 years of age, be and the same is hereby reposed in the Respondent, Genevieve T. O'Connor, with rights of reasonable visitation to the Complainant, and that the Complainant pay to the Respondent the sum of \$42.50 per month for the support and maintenance of each of the said children during their dependancy. IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant pay to the Respondent the sum of \$100.00 per month as alimony and

It is futher ordered, adjudged and decreed that neither party to this suit shall again marry except support, and that he convey such equity as he may have in the home to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal. furniture and equipment therein used and contained.

It is futher ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is futher ordered that Edward D. O'Connor the Complainant pay the cost herein to be taxed, for which executed may issue.

This 8th day of March 1960

[Signature] Judge Circuit Court, In Equity.

I, \_\_\_\_\_, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Register of Circuit Court, In Equity.

No. 4869 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

**FILED**  
3-8-1960  
I. DUCK, CLERK  
REGISTER

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

EDWARD D. O'CONNOR      COMPLAINANT

vs.

GENEVIEVE T. O'CONNOR      RESPONDENT

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Edward D. O'Connor and Lawrence E. O'Connor,

witnesses named in the requirement for Oral Examination, on the 8th day of March 1960, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Edward D. O'Connor and

Lawrence D. O'Connor doth depose and say as follows:

Testimony of Lawrence E. O'Connor:

My name is Lawrence E. O'Connor. I am over the age of twenty-one years and am personally acquainted with Edward D. O'Connor and Genevieve T. O'Connor. They are both over the age of twenty-one years, and both are resident citizens of Baldwin County, Alabama, having been such resident citizens for approximately 10 years. They were married in August of 1934, and lived together as husband and wife until about a month ago. Genevieve T. O'Connor attacked Edward D. O'Connor with a broken mirror and threatened him with other and further bodily injury.

Signed: Lawrence E. O'Connor

ORAL EXAMINATION

I, Frances G. Mallory as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and C. G. Chason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es ; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 8th day of March, 1960.

*Frances G. Mallory*  
\_\_\_\_\_  
(S.)

No. 4869 Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EDWARD D. O'CONNOR

COMPLAINANT

vs.

GENEVIEVE T. O'CONNOR

RESPONDENT

ORAL DEPOSITION

Filed

FILED  
MAR 8 1960  
REGISTER

Register

Record

Vol.

Page

Register

TESTIMONY OF EDWARD D. O'CONNOR:

My name is Edward D. O'Connor. I am over the age of twenty-one years and a bona fide resident citizen of Lillian, Baldwin County, Alabama, having resided in Baldwin County for approximately ten years. Genevieve T. O'Connor is over the age of twenty-one years, and a resident of Lillian, Baldwin County, Alabama, having also resided in this County and State for approximately ten years. We were married on August 18, 1934. For the last number of years, at times, my wife is subject to fits of rage and ungovernable temper, during which times on numerous occasions, she has threatened me with serious bodily harm, attended with danger to my life or health, and on one occasion she attack me with a piece of broken glass from a mirror, with which she was attempting to stab me or cut me. From her actions and conduct toward me, I have become apprehensive of my safety, and in fact, have really become mortally afraid of going to sleep in the home while she is in one of these rages. I really believe that it is probable that at some time when I was unable, or unaware, to defend myself, that she would do me serious bodily harm, causing injury to my life or health, or my death. We have six (6) children, two of whom are grown and self-supporting, these being Lawrence E. O'Connor and James D. O'Connor, and a Daughter, Mary Jo O'Connor, who is married. Of the three remaining children, Barbara Jean O'Connor, who is 16 years of age, and is presently residing with her older brother, Lawrence E. O'Connor, in Pensacola, Florida. The two younger children, Edward D. O'Connor, Jr. and Steven J. O'Connor, being 12 years of age and 10 years of age, respectively, are presently residing with my wife. I have been living out of the house for approximately 6 weeks due to the matters hereinabove set out. I believe at the present time that my wife will properly care for the two younger children, therefore, interpose no objections to their being left in her custody at present. I believe that Barbara Jean O'Connor, who is 16, would be better cared for by me or my older son, therefore, believe that she would be in my custody, so that I would be in a position to allow her to remain with him. I am, at the present time, financially able to pay the sum of One Hundred Dollars (\$100.00) per month as alimony and support for my wife, and the sum of Forty-two and 50/100 Dollars (\$42.50) per month for the support and maintenance of each of the two minor boys. I also believe it is proper that my wife should have our home located in Lillian, which is jointly owned, and am therefore preparing for delivery a conveyance of all my interest therein to her. I consider the furniture and fixtures therein located also to be hers.

Signed: Edward D. O'Connor

EDWARD D. O'CONNOR,

Complainant,

-vs-

GENEVIEVE T. O'CONNOR,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. She admits the allegations contained in Paragraph 1 of the Bill of Complaint.

2. She admits the allegations contained in Paragraph 2 of said Bill of Complaint.

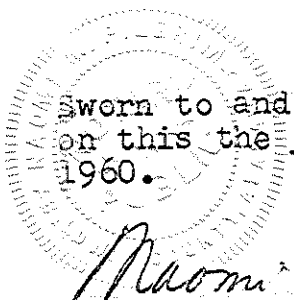
3. She denies each and every allegation contained in Paragraph 3 of said Bill of Complaint, and demands strict proof thereof.

4. She admits the allegations contained in Paragraph 4 of said Bill of Complaint.

5. She admits the allegations contained in Paragraph 5 of said Bill of Complaint.

*Genevieve O'Connor*  
    Mrs Edw O'Connor    

Sworn to and subscribed before me,  
on this the 20 day of February,  
1960.



*Naomi M. Pilgrim*  
\_\_\_\_\_  
Notary Public, Baldwin County, Alabama

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: FRANCES G. MALLORY

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Edward D. O'Connor and Lawrence D. O'Connor

a witness in behalf of Edward D. O'Connor in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

Edward D. O'Connor

, Complainant

and

Genevieve T. O'Connor

Respondent

on oath, to be by you administered, upon them  
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 8th day of March

195 60 .

Alice J. Alrick  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4869

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

EDWARD D. O'CONNOR

vs. Complainant

GENEVIEVE T. O'CONNOR

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:



EDWARD D. O'CONNOR

\_\_\_\_\_

\_\_\_\_\_

vs.

GENEVIEVE T. O'CONNOR

\_\_\_\_\_

\_\_\_\_\_

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,  
and Testimony of Edward D. O'Connor and Lawrence D. O'Connor

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

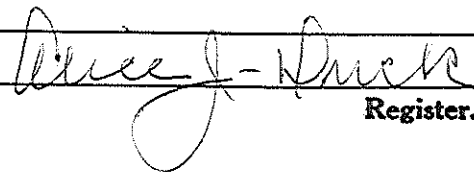
\_\_\_\_\_

and in behalf of Defendant upon Answer and Waiver

\_\_\_\_\_

\_\_\_\_\_

  
Solicitor for Complainant

  
Register.

m

No. 4869

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
Circuit Court of Baldwin County

EDWARD D. O'CONNOR

VS.

GENEVIEVE T. O'CONNOR

**Note of Testimony**

Filed in Open Court this

**FILED**

day of

**MAR 8 1960**

, 19

**ALICE L. DUCK, CLERK**  
**REGISTER** register.

CECIL G. CHASON

ATTORNEY-AT-LAW  
FOLEY, ALABAMA

March 7, 1960

Mrs. Alice J. Duck, Register  
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith are all papers relative to the divorce  
of Edward D. O'Connor and Genevieve T. O'Connor.

Please have the Judge sign and I will pick it up and pay  
you the Costs of Court when next in Bay Minette. I expect  
to be in Bay Minette Tuesday afternoon.

Yours very truly,



C. G. Chason

CGC:fm

encls. as noted.

EDWARD D. O'CONNOR,	)	
	)	
Complainant,	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
-vs-	)	
	)	IN EQUITY
GENEVIEVE T. O'CONNOR,	)	
	)	
Respondent.	)	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Edward D. O'Connor, and files this  
his Bill of Complaint for divorce against Genevieve T. O'Connor,  
and respectfully represents and shows unto your Honor:\*

1. That the Complainant is over the age of twenty-one years  
and is a bona fide resident citizen of Baldwin County, Alabama,  
having been such a bona fide resident citizen for approximately  
ten years. That the Respondent, Genevieve T. O'Connor, is over  
the age of twenty-one years and is a resident citizen of Baldwin  
County, Alabama.

2. That the Complainant and Respondent were lawfully  
married on, to-wit, August 18, 1934.

3. Complainant further avers that the Respondent has comm-  
itted actual physical violence on his person attended with danger  
to his life and health, by attacking him with a piece of broken  
glass, and has made threats of doing him other and further bodily  
harm, attended with danger to his life and health, and he is  
reasonable convinced that should he continue to live with her as  
husband and wife, she would commit other acts of violence on his  
person attended with danger to his life or health.

4. Complainant further shows to the Court that there was  
born of this marriage six children, two of whom, Lawrence E.  
O'Connor and James D. O'Connor, are self-supporting, Mary Jo  
O'Connor, who is married, Barbara Jean O'Connor, who is 16 years  
of age, resides at present with her older brother, Lawrence E.  
O'Connor, and Complainant alleges to the Court that he, as  
Complainant, is a fit and proper person to have the custody and  
control of Barbara Jean O'Connor, in order that he may allow the  
present arrangement to continue, and believes that the Respondent  
is a fit and proper person to have custody and control of Edward  
D. O'Connor, Jr., 12 years of age, and Steven J. O'Connor, 10

c.g.c.

years of age.

5. Complainant further shows that he is financially able to pay the sum of One Hundred Dollars (\$100.00) per month for alimony and support of the Respondent, and the sum of Forty-two and 50/100 Dollars (\$42.50) per month for each of the two minor children who are in the custody of the Respondent. He also believes it equitable and proper that he should convey his equity in the house located in Lillian, Alabama, to the Respondent, and that the furniture, fixtures and equipment in the dwelling should be considered as the property of the Respondent, for her use, and the use of the two minor children.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Genevieve T. O'Connor be made a party defendant of this cause by the usual process of this Honorable Court, requiring her to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that he be granted a divorce from the said Genevieve T. O'Connor, and that he be granted custody and control of Barbara Jean O'Connor, and that the Respondent be granted custody and control of Edward D. O'Connor, Jr., and Steven J. O'Connor, and that she be paid the sum of One Hundred Dollars (\$100.00) per month as alimony, and Forty-two and 50/100 Dollars (\$42.50) per month for each of the minor children, pending their dependency. Should your Complainant be mistaken in the relief prayed for that he be granted such other, further, different and general relief to which he may be entitled and as in duty bound he will ever pray.

  
Solicitor for Complainant

GENEVIEVE T. O'CONNOR,  
Complainant,  
VS.  
EDWARD D. O'CONNOR,  
Respondent.  
BALDWIN OIL MILLS, INC., a  
Corporation,  
Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY NO. 4869½

JUDGMENT NISI

It being shown to the Court that the Garnishee, Baldwin Oil Mills, Inc., a Corporation, has failed to file its answer as required by law and it appearing to the Court that a writ of garnishment has been duly issued in this cause by the Register of this Court and served upon said garnishee on November 14, 1961; it is, therefore, considered by the Court that the Complainant recover of the Garnishee the sum of Eight Hundred Fifty-five Dollars (\$855.00) and also the costs of this garnishment, unless at the present term of this Court, and within thirty days after the service of the rendition of this judgment, the said Garnishee appear and show cause why this judgment should not be made final and absolute, and that a copy of this order be served upon said Garnishee as required by law.

ORDERED, ADJUDGED AND DECREED on this the 28<sup>th</sup> day of December, 1961.

Hubert M. Wallace  
Judge

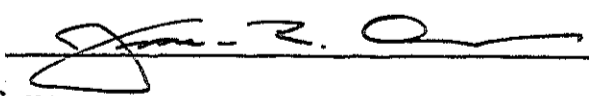
GENEVIEVE T. O'CONNOR,  
Complainant,  
VS.  
EDWARD D. O'CONNOR,  
Respondent,  
BALDWIN OIL MILLS, Inc., a  
Corporation,  
Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

4869 1/2

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared James R. Owen, who being by me duly sworn, deposes and says that Edward D. O'Connor is justly indebted to the said Genevieve T. O'Connor in the sum of Eight Hundred Fifty-five and No/100 Dollars (\$855.00) and that Baldwin Oil Mills, Inc., a Corporation, is supposed to be indebted to the said Respondent, or will be indebted to him in the future by a contract existing or by a contract existing will be liable to Edward D. O'Connor 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, or that Baldwin Oil Mills, Inc., a Corporation, has in its possession or under its control money or effects belonging to the Respondent and that affiant believes that process of garnishment is necessary to obtain satisfaction of said judgment, and that this writ is not sued out for the purpose of vexing or harassing the Respondent or other improper motive.



Sworn to and subscribed before me  
on this the 10th day of November, 1961.

Ernestine R. Sims  
Notary Public, Baldwin County, Alabama.

FILED

NOV 10 1961

ALICE J. DUCK, CLERK  
REGISTER

GENEVIEVE T. O'CONNOR,  
Complainant,  
VS.  
EDWARD D. O'CONNOR,  
Respondent,  
BALDWIN OIL MILLS, INC., a  
Corporation,  
Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

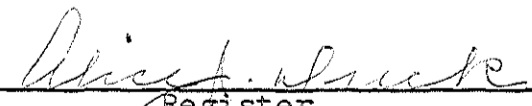
NOTICE OF GARNISHMENT TO RESPONDENT

TO: EDWARD D. O'CONNOR

You will take notice that affidavit having been made in the above cause, that Baldwin Oil Mills, Inc., a Corporation, is supposed to be indebted to the Respondent, Edward D. O'Connor, or have effects of the said Edward D. O'Connor in its possession or under its control and that he believes that process of garnishment is necessary against said Baldwin Oil Mills, Inc., a Corporation, to obtain satisfaction of said judgment.

That writ of garnishment has this day been issued to the said Baldwin Oil Mills, Inc., a Corporation, commanding it to be and appear before the Circuit Court to be held for Baldwin County, Alabama, and within thirty days after service thereof, then and there to answer on oath whether at the time of the service of the said writ of garnishment or at the time of making its answer whether or not it was indebted to the Respondent or would be indebted to him in the future by a contract then existing and whether or not it had in its possession or under its control personal property or things in action belonging to the said Respondent.

WITNESS my hand this 10th day of November, 1961.

  
Register



2154

4869 1/2

RECEIVED IN OFFICE  
NOV 13 1961  
M. S. BUTLER, Sheriff

Genevieve J. O'Connor

VS

Edward D. O'Connor

I hereby certify that this Notice of Garnishment has been served on Edward D. O'Comer 81826, an inmate confined at Trusty Barracks. This 13 day of November, 1961.

A.F. Lee, Commissioner, Board of Corrections, State of Alabama

where

11/13/61

GENEVIEVE T. O'CONNOR,  
 Complainant,  
 VS.  
 EDWARD D. O'CONNOR,  
 Respondent,  
 BALDWIN OIL MILLS, INC., a  
 Corporation,  
 Garnishee.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 IN EQUITY

WRIT OF GARNISHMENT

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

Whereas, James R. Owen, has made affidavit as required by Law, that the said Respondent, Edward D. O'Connor, is justly indebted to Genevieve T. O'Connor in the sum of Eight Hundred Fifty-five and no/100 Dollars (\$855.00), which sum is now due and unpaid and that he believes that process of garnishment is necessary to obtain satisfaction of said judgment, and that the Garnishee, Baldwin Oil Mills, Inc., a Corporation, has, or is believed to have in its possession or under its control, money or effects belonging to the Respondent, or that it is believed to be indebted to the Respondent, or to be liable to the Respondent 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.

These are therefore to command you, that you summon the said Baldwin Oil Mills, Inc., a Corporation, to be and appear at the next term of the Circuit Court of Baldwin County, Alabama, in Equity, to be held for said County, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession, or under its control any money or effects belonging to the Respondent; and whether it will be indebted to said Respondent, or is liable to

Respondent on any contract for the payment of money or the payment or 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.

WITNESS my hand on this the 10th day of November, 1961.

*Alfred Duck*  
Register

486 9/2

Genevieve J. O'Connor

vs.

Edward R. O'Connor

BY TAYLOR WILKINS, Sheriff DEPUTY SHERIFF  
Ten Cents per mile Total \$ 12.00  
Sheriff claims 12 miles at

Received 11 day of Nov. 1961  
and on 4 day of May 1961  
I served a copy of the within Edward R. O'Connor  
on Genevieve J. O'Connor  
By service on Harold Frank Van Dyke  
Taylor Wilkins, Sheriff  
D.S.

FILED  
NOV 10 1961  
ALICE J. DUCK, CLERK REGISTER



GENEVIEVE T. O'CONNOR,  
Complainant,  
VS.  
EDWARD D. O'CONNOR,  
Respondent.  
BALDWIN OIL MILLS, INC., a  
Corporation,  
Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY NO. 4869½

NOTICE OF JUDGMENT NISI

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

Whereas, on December 28, 1961, the Circuit Court of Baldwin County, Alabama, sitting in Equity, made and entered the following judgment to-wit:

"It being shown to the Court that the Garnishee, Baldwin Oil Mills, Inc., a Corporation, has failed to file its answer as required by law and it appearing to the Court that a writ of garnishment has been duly issued in this cause by the Register of this Court and served upon said garnishee on November 14, 1961; it is, therefore, considered by the Court that the Complainant recover of the Garnishee the sum of Eight Hundred Fifty-five Dollars (\$855.00) and also the costs of this garnishment, unless at the present term of this Court, and within thirty days after the service of the rendition of this judgment, the said Garnishee appear and show cause why this judgment should not be made final and absolute, and that a copy of this order be served upon said Garnishee as required by law.

"ORDERED, ADJUDGED AND DECREED on this the 28 day of December, 1961."

These are therefore to command you, that you make known the premises aforesaid to the said Baldwin Oil Mills, Inc., a Corporation, that it be and appear at the present term of said Court at the place of holding the same and within thirty days after service of the rendition of said judgment to show cause why said judgment

should not be made final and absolute against it and have you then  
and there this writ with your endorsement thereon.

WITNESS my hand as Register of the Circuit Court of  
Baldwin County, sitting in Equity, on this the 24 day of December,  
1961.

Alice J. Muck  
Register

✓  
4869 1/2

Genevieve J. O'Connor

vs.

Edward D. O'Connor

Baldwin Oil Mills,  
Inc. Kaminick

Received 30 day of Dec 1944  
and on 2 day of Jan 1945  
served a copy of the within Notice  
Baldwin Oil Mills, Inc.  
by service of Ed Pearson mgr.

TAYLOR WILKINS, Sheriff

[Signature]

[Signature]

Sheriff claims 22 miles at  
Ten Cents per mile Total \$ 2.20

BY [Signature]  
TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF



GENEVIEVE T. O'CONNOR,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA,
Vs.	)	
EDWARD D. O'CONNOR,	)	IN EQUITY
Respondent.	)	CASE No. 4869½
BALDWIN OIL MILLS, INC., a	)	
Corporation,	)	
Garnishee.	)	

Comes now Baldwin Oil Mills, Inc., a corporation, acting by and through E. E. Purvis, its General Manager, who being duly sworn deposes and says that he has personal knowledge of the facts herein stated and is authorized to sign this answer to garnishment and shows unto the Court the following:

1. That a judgement nisi heretofore rendered by the Clerk of this Court should not be made final and absolute in view of the matters and facts hereinafter set out.
2. That the Respondent Edward D. O'Connor is indebted to Baldwin Oil Mills, Inc., in a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00,) which said sum was due prior to the sum claimed by the Complainant in this cause.
3. That in October of 1961, one John Kiefer delivered to the said Baldwin Oil Mills, Inc., soy beans which were represented as belonging one-half ( $\frac{1}{2}$ ) to the said John Kiefer and one-half ( $\frac{1}{2}$ ) to the said Edward D. O'Connor, of which the Edward D. O'Connor share came to the sum of \$734.45.
4. That the sum of \$734.45 as aforesaid has been credited on to the sum due by the said Edward D. O'Connor to the said Baldwin Oil Mills, Inc.
5. That the said Baldwin Oil Mills at the time of the service of the writ of garnishment, and at the time of making this answer was not and is not indebted to the said defendant and that the said Baldwin Oil Mills, Inc. will not be indebted in the future to the said defendant by any contract then or now existing, nor will it be liable to the said defendant for the

(first page)

delivery of personal property nor for the payment of money which may be discharged by the delivery of personal property or which is payable in personal property, and garnishee has not in its possession nor under its control any money or effects belonging to the said defendant other than as herein shown.

Having fully answered said garnishment the garnishee prays to be dismissed.

BALDWIN OIL MILLS, INC.

BY: E E Purvis  
General Manager

STATE OF ALABAMA

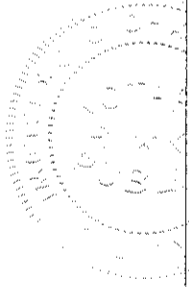
BALDWIN COUNTY

Before me, C. G. Chason, a Notary Public in and for said County in said State, personally appeared E. E. Purvis, who is known to me and who after being by me first duly and legally sworn deposes and says that the matters and facts alleged in the foregoing Answer of Garnishment are true and correct to the best of his knowledge, information and belief.

E E Purvis

Sworn to and subscribed before me, a Notary Public, on this the 26th day of January, 1962.

C. G. Chason  
Notary Public, Baldwin County  
State of Alabama



FILED

JAN 26 1962

ALICE J. DUCK, CLERK REGISTER