

LILLIE SMITH,  
  
Plaintiff,  
  
Vs.  
  
W. D. OWENS,  
  
Defendant

IN THE CIRCUIT COURT OF  
  
BALDWIN COUNTY, ALABAMA.  
  
AT LAW. NO. \_\_\_\_.

AFFIDAVIT FOR GARNISHMENT OF JUDGEMENT

Before me, M. A. Stone, Clerk of Circuit Court of Baldwin County, Alabama, personally appeared J. B. Blackburn, attorney for Lillie Smith who, after being duly and legally sworn deposes and says: That on the 11th day of September, 1933, the said Lillie Smith recovered judgement in the Circuit Court of Baldwin County, Alabama against W. D. Owens for the sum of Three Hundred Dollars (\$300.00) and the further sum of Sixty Dollars and Twenty Five Cents (\$60.25) cost of suit; that he believes that process of garnishment against the Southern Kraft Corporation, Mobile, Alabama, is necessary to obtain satisfaction of said judgement and that the said Southern Kraft Corporation is supposed to be indebted to or have effects of the said defendant, W. D. Owens, in its possession or under its control.

J. B. Blackburn

Sworn to and subscribed to before me this 16<sup>th</sup> day of October, 1934.

M. A. Stone  
Clerk Circuit Court,  
Baldwin County

GARNISHMENT AFFIDAVIT

LILLIE SMITH, Plaintiff,

Vs.

W. D. OWENS, Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 103.

Filed this 16<sup>th</sup> day  
of October, 1934.

*Filed Oct 16<sup>th</sup> 1934  
W. A. Stone Clerk*

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

LILLIE SMITH,

Plaintiff,

VS.

W. D. OWENS,

Defendant,

SOUTHERN KRAFT CORPORATION,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

AFFIDAVIT IN CONTEST OF ANSWER OF GARNISHEE.

Comes the Plaintiff in the above entitled cause,  
by J. B. Blackburn, as her Attorney, and for contest to the Answer  
filed by the said Garnishee on the 26th day of November, 1934, says  
That he believes the said Answer to be untrue.

J. B. Blackburn

Sworn to and subscribed before me  
on this the 27th day of November, 1934.



Ora Simon

Notary Public, Baldwin County, Alabama.

Plaintiff demands a jury for the trial  
of the issues to be made up between the  
parties to this cause.

J. B. Blackburn

Attorney for Plaintiff.

Dec 92825-

105

Lillie Smith

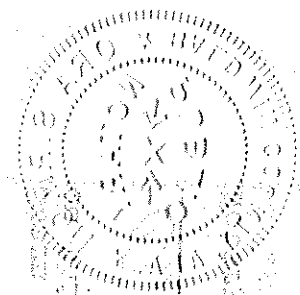
VS

W.D. Carter  
Southern Ry Co

AFFIDAVIT IN CONTEST OF ANSWER  
OF GARNISHMENT

IN THE CIRCUIT COURT OF  
SANDHIA COUNTY, ALABAMA.

Filed  
Nov. 27 1934  
M. G. Stone



Approved for Filing

Deftes to this case.  
of the reason to be made to release the  
plaintiff demands a jury for the trial

Approved for Filing

W.D. Carter

103

Lillie Smith

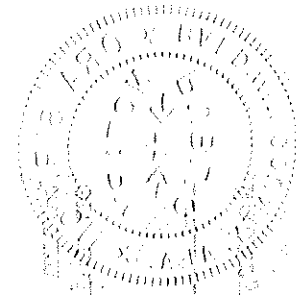
VS

W. D. Owen  
Southern Ry.

AFFIDAVIT IN CONTEST OF ANSWER  
OF GARNISHMENT

IN THE CIRCUIT COURT OF  
MIDDLEBURY COUNTY, VERMONT.

Filed  
Nov. 27, 1934  
M. G. Spaulding  
Clerk



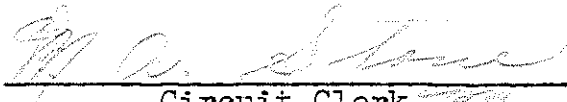
Joint and not valid & claimed validly  
and asserted or shown or of correct ed. for  
and asserted or shown or of correct ed. for

Returned for Remedy

TO W. D. OWENS:

You are hereby notified that a garnishment was issued out of the Circuit Court of Baldwin County, Alabama on the 16th day of October, 1934 on the judgement secured by Lillie Smith against you in the said court on the 11th day of September, 1933, in which the Southern-Kraft Corporation was named as garnishee.

WITNESS my hand this 19 day of October, 1934.

  
Circuit Clerk

Original

Please <sup>check</sup> return copy on  
102 drawing or make  
usual return.

105 Wm. Stuart  
Sherrill

Executed this 15th  
Day of Dec. 1934. By  
Serving copy on  
W.D. Owens.

By J. B. Raby, D.S.

Escombria Co. Ala.

Lillie Smith,  
Plaintiff,  
Vs.  
W. D. Owens,  
Defendant,  
Southern Kraft Corporation,  
Garnishee.

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

No. \_\_\_\_\_

Now comes Southern Kraft Corporation, Garnishee in the above stated cause, and for answer to the writ of garnishment served upon it in this cause, upon oath says, that it is not indebted to the above named defendant at the time of the service of the garnishment in this cause, nor at the time of making this answer, and that it will not be indebted in the future to the said defendant by a contract then or now existing; and that it has not in its possession or under its control personal or real property, or things in action belonging to the said defendant.

And garnishee having fully answered, prays to be discharged with its reasonable cost in this behalf expended.

SOUTHERN KRAFT CORPORATION,

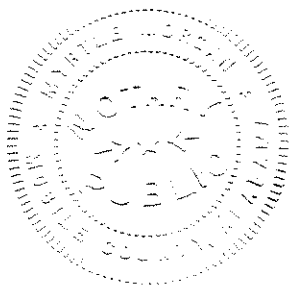
By H. S. Galloway  
(H.S. Galloway) Agent.

THE STATE OF ALABAMA, )  
MOBILE COUNTY. )

Before me, Myrtle Morgan, a Notary Public in and for said County and State, personally appeared H. S. Galloway, who, being by me duly sworn, deposes and says that he is Agent for Southern Kraft Corporation, a corporation, and as such is authorized to make answer to the garnishment served upon it in the foregoing cause; that he is familiar with the facts concerning said matter, and that the foregoing answer of the Garnishee made in its name by him as Agent is true and correct to the best of his knowledge, information and belief.

Sworn to and subscribed before me this the 23 day of November, 1934.

Myrtle Morgan  
Notary Public, Mobile County, Alabama.  
NOTARY PUBLIC, MOBILE COUNTY  
My Commission Expires Sept. 4, 1935





Dec 92824

RECORDED

105,

Lillie Smith

vs

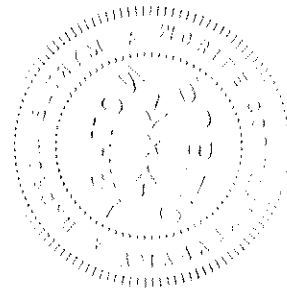
W.D. Carr

Southern Life  
Insurance Co

Answer of

Garrison

Filed Nov 26 1934  
H. L. Stone



RECEIVED  
FEDERAL RESERVE BANK OF NEW YORK  
DEC 19 1934  
105

W.D. Carr

W.D. Carr

The State of Alabama }  
Baldwin County }

CIRCUIT COURT

No. \_\_\_\_\_ Term, 193\_\_\_\_\_

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of \_\_\_\_\_

Defendants,

you cause to be made the sum of \_\_\_\_\_ Dollars.

which \_\_\_\_\_ Plaintiffs

recovered of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_\_\_, by

the Judgment of our Circuit Court held for the County of Baldwin, besides the sum of \_\_\_\_\_

Dollars

costs of suit, and have the same to render to the said \_\_\_\_\_

and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_, 193\_\_\_\_ to date of collection.

Witness my hand, this \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_\_\_\_

Clerk

[illegible]

128a

# The State of Alabama

## Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_ Term, 193\_\_\_\_\_

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of \_\_\_\_\_  
 \_\_\_\_\_ Defendants,  
 you cause to be made the sum of \_\_\_\_\_ Dollars,  
 which \_\_\_\_\_ Plaintiffs  
 recovered of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_\_\_, by  
 the Judgment of our Circuit Court held for the County of Baldwin, besides the sum of \_\_\_\_\_  
 \_\_\_\_\_ Dollars

costs of suit, and have the same to render to the said \_\_\_\_\_

and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_, 193\_\_\_\_ to date of collection.

Witness my hand, this \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_\_\_

Clerk

CLERK'S FEES	AMOUNT	SHERIFF'S FEES	AMOUNT
For every Summons & Complaint \$1.25		For Levying an Attachment \$3.00	
Each copy thereof 30		Entering and Returning Attachment 25	
Entering a Sheriff's Return 20		Summoning Garnishee 1.50	1.50
Docketing 25	30	Serving Summons on Writ 1.30	1.50
Entering Appearance 20	50	Serving Notice Sci. Fa. Notice, etc. 65	
Filings 10	40	Serving Subpoenas 65	
Every order made in Court 30	30	Empanelling Jury 75	
Copy thereof 25		Entering and Returning Execution 25	
Every trial with or without Jury 75	75	Collecting Cost Executions 1.50	
Entering up Judgment or copy thereof 30		Executing a Writ of Possession 2.50	
Issuing Execution 50	50	Taking and Approving Bonds 1.00	
Docketing Execution 25	15	Commissions and return	
Entering Return on Execution 20	20	Witness Fees	
Issuing Subpoenas 30			3 00
Administering Oath 25			
Issuing each Attachment and taking bond 1.00			
Filing Attachment 10		RECAPITULATION	
Each Summons for Garnishee 50	50	Judgment for for \$	
Taking Answer to Garnishee 50	50	Interest from 1	
Commissions to take Depositions or Copy 75		Damages	
Order to Execute Writ of Inquiry 30		Clerk's Fees	6 85
Copy of Interrogatories, 15c per 100 words or 50		Sheriff's Fees	3 00
Filing each Deposition and endorsing same 20		Justice of Peace Fees	
Final Record, per 100 words 15	3 00	Witness Fees in Justice of Peace Court	
Every Certificate requiring Seal 50		Constable's Fees	
Taking Bond not otherwise provided for 75	6 85	Commissioner's Fees	
Witness Certificates 25		Printer's Fees	
Continuance 10		Witness Fee in Circuit Court	
Certificate of Judgment 50		Former Clerk's Fees	
		Stenographer's Fee \$5.00	
		Trial Tax 3.00	2 00

(292)

128.5

No. 105

**The State of Alabama,**  
BALDWIN COUNTY

**CIRCUIT COURT**

Lillie Kirk

VS.

PLAINTIFF....

J. D. Owen

Lucien Kraft Gough

DEFENDANT....

**CIVIL EXECUTION**

Judgment for ..... for \$ .....

Interest from ..... 193 .....

to ..... 193 .....

Damages ..... \$ .....

Costs ..... \$ .....

Total ..... \$ .....

Civil Fee Book ..... Page .....

Execution Docket ..... Page .....

Filed ..... 193 .....

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

**COLLECT COST FROM**

**THE STATE OF ALABAMA,**  
Baldwin County.

I hereby certify that the within Judgment and  
Costs in this case are correct, and there was a  
waiver of exemption as to personal property under  
the Constitution and Laws of Alabama.

This ..... day of ..... 193 .....

\_\_\_\_\_  
Clerk

Received in office

\_\_\_\_\_, 193 .....

\_\_\_\_\_, Sheriff

Sheriff's Execution Docket, Page .....

Sheriff's Fee Book, Page .....

THE STATE OF ALABAMA, BALDWIN COUNTY.

By virtue of the within Execution, I have, at ..... o'clock, ..... M., this ..... day  
of ..... 193 ....., levied

Sheriff

LILLIE SMITH,

Plaintiff,

Vs.

W. D. OWENS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. \_\_\_\_.

#### GARNISHMENT ON JUDGEMENT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, on the 11th day of September, 1933, Lillie Smith recovered judgement against W. D. Owens for the sum of Three Hundred Dollars (\$300.00) and costs of suit amounting to Sixty Dollars and Twenty-five cents (\$60.25), and affidavit having been made by J. B. Blackburn, attorney for the said Lillie Smith, that the Southern Kraft Corporation, Mobile, Alabama, is supposed to be indebted to or have effects of the said W. D. Owens in its possession or under its control and that he believes process of garnishment against the Southern Kraft Corporation is necessary to obtain satisfaction of the said judgement.

You are, therefore, hereby commanded to summon said Southern Kraft Corporation to be and appear before the Circuit Court of Baldwin County, Alabama, at the Court House thereof, within Thirty (30) days from service of this writ, then and there to answer under oath whether it was indebted to the above named defendant at the time of the service of this summons, or the time of making its answer hereto, and in what sum or sums; and whether it will not be indebted in future to the said defendant by a contract then existing or at the time of the service of this summons; and whether it has not in its possession, or under its control, personal or real property, or things in action, belonging to the said defendant, W. D. Owens. Herein, fail not, and have you by and for this writ.

No. 105  
**The State of Alabama,**  
BALDWIN COUNTY

**CIRCUIT COURT**

Willie Smith

VS. PLAINTIFF....

J. D. Owens  
Deputy Sheriff

DEFENDANT....

**CIVIL EXECUTION**

Judgment for ..... for \$ .....  
Interest from ..... 193 .....

to ..... 193 .....

Damages ..... \$ .....

Costs ..... \$ .....

Total ..... \$ .....

Civil Fee Book ..... Page .....

Execution Docket ..... Page .....

Filed ..... 193 .....

..... Clerk

..... Plaintiff's Attorney

..... Defendant's Attorney

**COLLECT COST FROM**

**THE STATE OF ALABAMA,**  
Baldwin County.

I hereby certify that the within Judgment and  
Costs in this case are correct, and there was a  
waiver of exemption as to personal property under  
the Constitution and Laws of Alabama.

This ..... day of ..... 193 .....

..... Clerk

Received in office

....., 193 .....

....., Sheriff

Sheriff's Execution Docket, Page .....

Sheriff's Fee Book, Page .....

THE STATE OF ALABAMA, BALDWIN COUNTY.

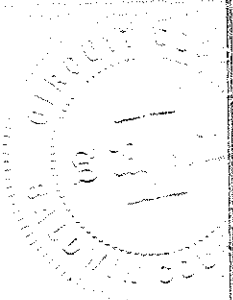
day ..... M., this ..... o'clock,

By virtue of the within Execution, I have, at .....

of ..... 193 ...., levied

She

IN WITNESS WHEREOF, I have hereunto set my hand and  
affixed the seal of the Circuit Court of Baldwin County, Alabama  
on this the 16<sup>th</sup> day of October, 1934.



W. A. Stone  
Circuit Clerk

ORIGINAL RECORDED  
WRIT OF GARNISHMENT

LILLIE SMITH, Plaintiff,  
Vs.

W. D. OWENS, Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 105.

Dated this 16th day  
of October, 1934.

*M. A. Stone*

J. B. BLACKBURN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

RECORDED

Received 17 Day of October 1934  
and on 17 Day of October 1934

I served a Copy of the within Garnishment  
on Deborah Street Corp.

by serving on George Morrison

at street time

*J. B. Blackburn*  
D. S.