

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-vs-

J. B. WILTERS,

Defendant,

HARRY J. WILTERS, doing business
as J. B. WILTERS & COMPANY,

Garnishee Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ISSUE TENDERED BY PLAIN-
TIF ON CONTEST OF THE
ANSWER OF THE GARNISHEE

STATE OF ALABAMA }
BALDWIN COUNTY }

Lloyd A. Magney, being first duly sworn, on his oath deposes and says: That he is attorney for the above named Plaintiff and has filed a contest of the answer of the garnishee in the above entitled cause.

That the answer of the garnishee is untrue in this, that ever since the year 1921 the defendant, J. B. Wilters, has been in the employ of the garnishee at a salary of THIRTY DOLLARS (\$30.00) a week; that such employment has continued and was in effect as late as August 17th, 1936, said contract of employment having been testified to by both the garnishee and the defendant before this Court upon August 17th, 1936.

That affiant was advised by the attorney for the garnishee and the defendant, Honorable Hubert M. Hall, after the said hearing on August 17th, 1936, but on the same day and at the time when affiant filed the affidavit of garnishment against the present garnishee, that the defendant was indebted to the garnishee for advances upon said salary account and that the garnishee would have to answer that he was not indebted to the defendant.

However, the answer of the garnishee goes further than the mere statement of no indebtedness and states that the garnishee

will not be indebted to the defendant in the future by any contract between them and in this respect, affiant believes the answer to be untrue for the reason that the defendant still continues to act as manager for the garnishee, as he has done heretofore and affiant believes that there is a contract of employment existing between the garnishee and the defendant under which the garnishee will necessarily become indebted in the future to the defendant.

Steph Tomagney

Subscribed in my presence and sworn to before me this 17
day of September, 1936.

Gus Schutty
Notary Public

RECORDED
7-5-38
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-vs-

J. B. WILTERS,
Defendant,

HARRY J. WILTERS, doing busi-
ness as J. B. WILTERS & COM-
PANY,

Garnishee Defendant.

ISSUE TENDERED BY PLAINTIFF
ON CONTEST OF THE ANSWER OF
THE GARNISHEE

Filed Sept 14 1936
R. A. Magney
Clerk

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

Robertsdale Ala

May 16th 1921

B I L L . o f S A L E

Know all men by these presents, that I. John B Wilters, in consid-
-eration of the Sum of one thousand Dollars (\$1.000.00) and other
Valuable considerations, to me in hand paid. the receipt of which is
hereby acknowledged, do bargain sell and deliver to the said Harry
Wilters. the following goods and Chattels. to Witt,

The Contents equipment and machinery tools. and all Automobile
assessories together with All Automobile Parts, Tires. and all other
equipment contained in the building Known as J B Wilters. & Co's
Garage situated on Milwaukee Street Robertsdale Alabama.

Also. one olds Mobile. one Maxwell. ~~xxx~~ one 1918 Case Tractor. and
everything ~~in~~ contained in building as above described.

The said Harry Wilters to assume all Debts and incumberances. and
all outstanding accounts shall be the property of the Said Harry
wilters. from this Date.

Given under my hand and seal this 16th day of May
1921

John B. Wilters

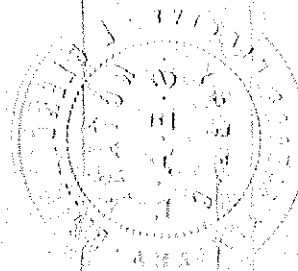
State of Alabama.
County of Baldwin

Subscribed and sworn to before me this 16th day of
May A.D. 1921

L. L. Henderson
Notary Public in and for said County & State
My Commission expires February 12, 1923

this Bill of sale made in Duplicate

07



STATE OF ALABAMA, Office of the Judge of the Probate Court
JAMES M. VOLTA, Judge of said Court in and for the County of ...
do hereby certify that the within ...
... 10th ... at ...
... and I further certify that the same is duly recorded in Record Book No. 2 mck
- 438 ...
- June 20th ...
James M. Volta
J. M. Volta

L. Glendon ...
Robert ...
3/18/21
J. am.

STATE OF ALABAMA, BALDWIN. COUNTY

IN THE CIRCUIT COURT

August Term, 19 36Farmers & Merchants Bank,

Versus

Plaintiff.

J B Wilters.

Defendant.

Harry J Wilters. Doing Business as J B Wilters. & Co.

Garnishee.

To J B Wilters

You will take notice that affidavit having been made in the above stated cause, that

Harry J Wilters Doing business as J B Wilters & Co.is supposed to be indebted to the said defendant J B Wilters.or have effects of the said J B Wilters. in Hispossession or under his control and that he believes that process of garnishment is necessary against said J B Wilters. to obtain

satisfaction of said judgment.

That Writ of Garnishment has this day been issued to the said Harry J Wilters.Doing business as J B Wilters & Co commanding him. to be and appear beforethe Circuit Court to be holden for Baldwin. County, Alabama, and within thirty daysafter service thereof, then and there to answer on oath what he indebted to saidJ B Wilters.

at the time of service of this Writ of Garnishment.

or at the time of making his answer, and whether he will not be indebtedin future to him by a contract then existing, and whether he have not inhis possession or under his control personal or real property or things in action be-longing to defendant J B Wilters.Witness my hand this the 19th day of August, 1936R. D. Noel, Clerk.

sewer J. B. Wilter
No. *7-537*
STATE OF ALABAMA

BALDWIN. COUNTY
CIRCUIT COURT

Farmers & Merchants, Bank.

Plaintiff.
vs.
J BWilters.

Defendant.
Harry J Wilters. Doing business
As J B Wilters. & Co.
Garnishee.

**Notice to Defendant of Issuing
Garnishment**

Layman
Attorney.

Received in office, 19.....

Sheriff.

Executed by serving *9*
cop. *X* of the within Writ of Garnish-
ment on the within named.

J. B. Wilters

on the *24* day of *August*, 19*36*

M. H. Wilkins
Sheriff.

GARNISHMENT ON JUDGMENT

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

August TERM, 1923⁶

To Any Sheriff of the State of Alabama—Greeting:

WHEREAS, At a regular Fall Term, 192³³, of the Circuit Court of Baldwin County,
to-wit: On the 21 day of August, 192³³ being a regular day of
said term. Farmers & Merchants Bank. of Foley.

recovered judgment against J B Wilters.

for the sum of Twelve hundred forty Nine and 14/100. Dollars, and cost of suit,
and affidavit having been made by Lloyd A Magney.
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

Harry J Wilters doing business as J B Wilters & Co.

has or is believed to have in his possession, or under his control money
or effects belonging to said defendant J B Wilters or that he is, or
is believed to be indebted to said defendant J B Wilters 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 dis-
charged by the delivery of personal property or which is payable in personal property.

You are Therefore Hereby Commanded to Summon Harry J Wilters.
doing Business as J B Wilters & Co.

to be and appear before the honorable the Circuit Court for Baldwin County, at the Court House thereof, in
the City of Bay Minette, on the with in 30 day from service of this writ Monday in A. D. 192
then and there within the three first days of the term, to answer on oath, whether at the time of the service of
the garnishment, or at the time making his answer, or at any time intervening the time of serving
the garnishment and making the answer his was he indebted to said defendant
and whether he will not be indebted in future to said de-
fendant 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
he has not in his possession or under his control money or
effects belonging to the defendant J B Wilters.

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

Witness, XXXXXX, Clerk of said Court, this 19th

day of August A. D. 192³⁶

Issued Ex 19th day of August A. D. 192³⁶

ATTEST:

R S Duck Clerk.

Executed this
2nd day of May
1936 by serving
a copy of
the within writ
on Harry Wilters.
M. Wilkins
Sheriff

Serve on Harry Wilters
7-537
Circuit Court, Baldwin County

No.

Farmers & Merchants Bank.

VS. } GARNISHMENT ON JUDGMENT

J B Wilters.

Harry J Wilters. Doing Business
as J B Wilters & Co.

Issued 19th day of Aug, 19236

Returnable day of 192

Lloyd A. Maynor
Attorney.

GARNISHMENT ON JUDGMENT

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

Fall TERM, 19236

To Any Sheriff of the State of Alabama—Greeting:

WHEREAS, At a regular Fall Term, 19233, of the Circuit Court of Baldwin County, to-wit: On the 21 day of August, 1933 being a regular day of said term Farmers & Merchants Bank of Foley A Corporation.

recovered judgment against J B Wilters.

for the sum of Twelve hundred forty nine and 14/100 Dollars, and cost of suit, and affidavit having been made by Lloyd A Magney. that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

Elberta State Bank a Corporation.

has or is believed to have in its possession, or under its control money or effects belonging to said defendant J B Wilters or that it is, or is believed to be indebted to said defendant J. B. Wilters 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 Elberta State Bank.

to be and appear before the honorable the Circuit Court for Baldwin County, at the Court House thereof, in the City of Bay Minette, on the Monday in Within 30 days from the service of this Writ A. D. 19236 then and there within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the time making its answer, or at any time intervening the time of serving the garnishment and making the answer it was it indebted to said defendant J. B. Wilters. and whether it will not be indebted in future to said defendant J. B. Wilters. 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 J B Wilters

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

Robert S Duck.

Witness, ~~XXXXX~~, Clerk of said Court, this 24th

day of July A. D. 192 36

Issued July 24th day of July A. D. 19236.

ATTEST:

Robert S Duck Clerk.

Executed July 28 1936
by serving copy of within Summons and
~~Complaint~~ writ on
Alfred Neumann
Cashier of Elberta
State Bank

M. H. Wilkins Sheriff
By C. V. Anderson Deputy Sheriff

RECORDED
Dick
7-534

Circuit Court, Baldwin County

No. 290

Farmers & Merchants Bank,
a Corporation.

VS. } GARNISHMENT ON JUDGMENT

J B Wilters.

Elberta State Bank, a Corp,

Issued 24th day of July 19236

Returnable day of 192

Attorney.

STATE OF ALABAMA, Baldwin. COUNTY

IN THE CIRCUIT COURT

Fall Term, 19³⁶Farmers & Merchants Bank, a Corporation.

Plaintiff.

Versus

J B Wilters.

Defendant.

Elberta State Bank, a Corp.,

Garnishee.

To J B Wilters.

You will take notice that affidavit having been made in the above stated cause, that

Elberta State Bank.is supposed to be indebted to the said defendant J B Wilters.or have effects of the said J B Wilters. in itspossession or under its control and that he believe S that process of gar-nishment is necessary against said J B Wilters. to obtain

satisfaction of said judgment.

That Writ of Garnishment has this day been issued to the said Elberta State Bank. commanding it to be and appear beforethe Circuit Court to be holden for Baldwin. County, Alabama, and within thirty daysafter service thereof, then and there to answer on oath what it is indebted to saidJ B Wilters. at the time of service of this Writ of Garnishment.or at the time of making its answer, and whether it will not be indebtedin future to J B Wilters by a contract then existing, and whether it have not inits possession or under its control personal or real property or things in action be-longing to defendant J B Wilters.Witness my hand this the 24th day of July., 19³⁶Robert W. Smith, Clerk.

STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Farmers & Merchants Bank
a Corp.,

Plaintiff.

vs.

J. B. Wilters.

Defendant.

Elberta State Bank a Corp
Garnishee.Notice to Defendant of Issuing
Garnishment

Lloyd A Magney

Attorney.

Received in office _____, 19____

Sheriff.

Executed by serving _____
cop. 7 of the within Writ of Garnish-
ment on the within named.J. B. Wilterson the 28 day of July, 1936M. H. Wilcher
C. N. Anderson D. Sheriff.

FARMERS & MERCHANTS BANK of
FOLEY, a corporation,

Plaintiff,

-vs-

J. B. WILTERS,

Defendant,

STATE BANK OF ELBERTA, a
Corporation,

Garnishee Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
No. 9779

NOTICE TO SUGGESTED CLAIM-
ANT

TO HARRY WILTERS:

You are hereby notified that on the 24th day of July, 1936, there was filed in my office, by the Plaintiff in the above entitled cause, an affidavit for garnishment on judgment in which State Bank of Elberta was named as Garnishee; that on said 24th day of July, 1936, I issued Writ of Garnishment directed to said State Bank of Elberta, as Garnishee, and delivered the same to the Sheriff of Baldwin County for service; that thereafter said Writ of Garnishment was by said Sheriff served upon said State Bank of Elberta, garnishee, and said garnishee filed in my office its answer, in writing, in which answer it is stated that said Garnishee was and is indebted to J. B. Wilters & Company, J. B. Wilters, Manager, in the amount of THIRTEEN HUNDRED SIXTY SIX & 22/100 (\$1366.22) DOLLARS; in said answer it is also stated that said Garnishee is advised that said funds are your property and by said answer you are suggested as the claimant of said property.

As provided by law, therefore, you are hereby notified to appear in this Court, at the place of holding same, within thirty (30) days after service of this notice upon you and, then and there, propound your claim to said property and contest with the Plaintiff the right to such debt, demand, money or effects.

Witness my hand this 31st day of July, 1936.

Robert Duck

Clerk

2-5-36
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
No. 9779

FARMERS & MERCHANTS BANK of
Foley, a corporation,

Plaintiff,

-vs-
J. B. WILTERS,

Defendant,

STATE BANK OF ELBERTA, a
Corporation,

Garnishee Defendant.

NOTICE TO SUGGESTED CLAIMANT

Filed August 1st 1936
Robert Duck
clerk

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

(117)
Rec in office
8/1/36
M. H. Wilkins
Sheriff

Executed by serving a copy
of the within on

Harry Wilters 8/4/36

M. H. Wilkins, Sheriff.

By Lonnie Bryant D.S.

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-vs-

J. B. WILTERS,

Defendant,

HARRY J. WILTERS, doing business
as J. B. WILTERS & COMPANY,

Garnishee Defendant.

STATE OF ALABAMA }

BALDWIN COUNTY }

Lloyd A. Magney, being first duly sworn, on his oath
deposes and says: That he is attorney for the above named Plain-
tiff; that he believes the Answer heretofore made by the garnishee
herein and filed in this Court on September 11th, 1936, to be
untrue.

Lloyd A. Magney

Subscribed in my presence and sworn to before me this 12
day of September, 1936.

Gus Schultz
Notary Public

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-vs-

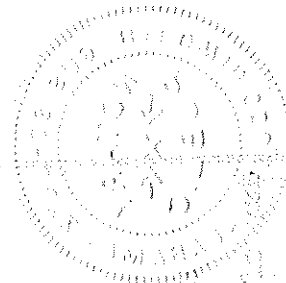
J. B. WILTERS,
Defendant,

HARRY J. WILTERS, doing busi-
ness as J. B. WILTERS & COM-
PANY,
Garnsihee Defendant.

CONTEST OF ANSWER OF GARNISHEE

Filed Sept 14 1936
R. S. DeLoach
clerk

LLOYD A. MAGNEY
Attorney
Foley Alabama.



GARNISHMENT-- ANSWER OF GARNISHEE.

THE STATE OF ALABAMA. }
COUNTY OF BALDWIN. }

FARMERS AND MERCHANTS }
BANK. FOLEY. ALABAMA. }
PLAINTIFF. }

VS.

J.B.WILTERS. }
DEFENDANT. }

In The Circuit Court of Baldwin County,
Alabama.

STATE BANK OF ELBERTA }
ELBERTA, ALA. }
GARNISHEE. }

In the Circuit Court of Baldwin County, Alabama, comes Alfred M. Neumann, Cashier of the State Bank of Elberta, Elberta, Ala., garnishee in the above stated cause, and makes his answer, in writing, under oath, in accordance with the terms of said garnishment, as follows: That it, the State Bank of Elberta, Alabama, was not indebted to the above named defendant at the time of the service of the garnishment in the above stated cause, or at the time of making its answer therein, but that it was indebted to the J.B. Wilters and Co., J.B. Wilters, Manager, in the amount of thirteen hundred sixty six dollars and twenty-two cents--- (\$1366.22) which said funds we are advised are the property of Harry Wilters and do not belong to the defendant, J.B. Wilters. It, the State Bank of Elberta, Alabama, will not be indebted to said defendant in the future for any other amounts, and it has no other property of the above defendant in its possession.

Having made full and true answer to this writ, the garnishee prays that it be discharged with its reasonable costs.

SWORN to and subscribed before me this the 27th. day of July, 1936

Geo. Lindover
Notary Public, Baldwin County, Ala.

State Bank of Elberta, Alabama.

Alfred M. Neumann
Cashier.

RECORDED

Duck

7-535

Filed July 28 1934
Robert L. Duck

FARMERS & MERCHANTS BANK OF FOLEY,
a Corporation,

Plaintiff,

-vs-

J. B. WILTERS,

Defendant.

ELBERTA STATE BANK, a Corporation,
Garnishee,

Defendant.

STATE OF ALABAMA)

BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 9779

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

Lloyd A. Magney, being first duly sworn, on his oath deposes and says, that he is attorney of record for the above named Plaintiff; that on the 21st day of August, 1933, the said Farmers & Merchants Bank of Foley recovered judgment against said J. B. Wilters for the sum of TWELVE HUNDRED FORTY NINE & 14/100 (\$1249.14) DOLLARS and the further sum of ELEVEN DOLLARS FIFTY CENTS (\$11.50) costs of suit; that a certificate of said judgment was recorded in the office of the Judge of Probate of Baldwin County, Alabama, on October 31st, 1933, in Judgment Book No. 2 at page 318 thereof; that no part of said judgment has been paid; that he believes the process of garnishment against Elberta State Bank, a corporation, is necessary to obtain satisfaction of said judgment and that the said Elberta State Bank, a corporation, is supposed to be indebted to or have effects of the said defendant in its possession or under its control.

Lloyd A. Magney

Subscribed in my presence and sworn to before me this 23rd
day of July, 1936.

Geo. Schultz
Notary Public

RECORDED
7-534
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
No. 9779

FARMERS & MERCHANTS BANK OF
FOLEY, a corporation,
Plaintiff.

-vs-

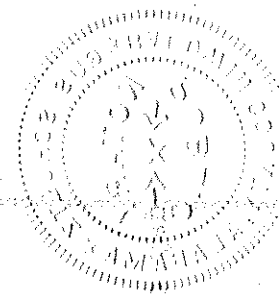
J. B. WILTERS,
Defendant.

ELBERTA STATE BANK, a corporation
Garnishee,
Defendant.

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

Filed July 24, 1936
Robert S. Duck,
Clerk.

LLOYD A. MAGNEY
Attorney
Foley, Alabama.



FARMERS & MERCHANTS BANK
OF FOLEY, a Corporation,

Plaintiff,

VS.

J. B. WILTERS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW,

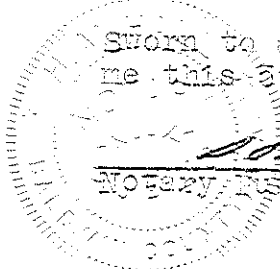
NO. 9779.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, H. M. Hall, a Notary Public, in and for said County, in said State, personally appeared HARRY J. WILTERS, who is known to me and who having been by me first duly sworn, deposes and saith: That the money, to-wit, Thirteen Hundred Sixty-six and 22/100 (\$1366.22) Dollars, on deposit in the State Bank of Elberta in the name of J. B. Wilters & Company, J. B. Wilters, Manager, and against which a garnishment was issued in the above stated cause and served on the State Bank of Elberta, a Corporation, as Garnishee, and which Garnishee has filed an answer alleging that the money belongs to me, is not the property of J. B. Wilters, the Defendant in the above styled cause, but is the property of the affiant, Harry J. Wilters, and that the affiant has a just claim to the money so garnished.

Sworn to and subscribed before
me this 23th day of August, 1936.


Notary Public, Baldwin County,
Alabama.

Harry J. Wilters

RECORDED
duck
7-536

PLAINT OF HARRY J. WILTERS

FARMERS & MERCHANTS BANK,
OF FOLEY, a Corporation,

Plaintiff,

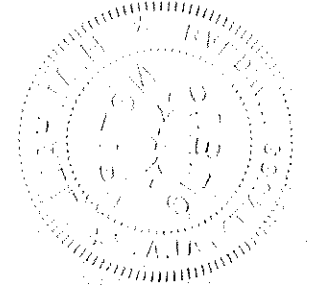
VS.

J. B. WILTERS,

Defendant.

IN THE CIRCUIT COURT OF
BRIDGEM COUNTRY, ALABAMA,

AT LAW,
NO. 9779.



Filed August 5, 1936
R. S. Duck, Clerk

Farmers & Merchants
Bank of Foley.
Plaintiff

Circuit Court
Baldwin County.
Law # 790.

J B Willets
Def.

Demurrer to claim.

State Bank of Alberta
Garnishee

Harry J Willets
Claimant

comes now the Plaintiff demurs to the
claim of Harry J. Willets and as grounds for
such demurrer says:

1. No facts are averred as the basis for said claim.
2. The claim states mere conclusions rather than facts upon which issue may be taken.
3. The claim sets forth no facts showing a right in the claimant to the property.

Shaptonmayer
atty for Def.

Law # 790.

RECORDED

~~Index~~

7-536

J x M Bank of Foley

v

J B Winters

Atlanta State Bank
Garnishee

Harry J Winters
Claimant

Memorandum to claim.

Filed August 18 1936

R L Duck
Clerk

Leopold A Magney
Attorney for Def.

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-vs-

J. B. WILTERS,

Defendant.

STATE BANK OF ELBERTA, a
Corporation,
Garnishee,

HARRY J. WILTERS,

Claimant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
No.290

ANSWER OF PLAINTIFF TO
CLAIM OF HARRY J. WILTERS.

Comes now the Plaintiff and for answer to the claim heretofore filed by Harry J. Wilters says:

That the allegations of said claim are untrue.

Attorney for Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
No. 290

FARMERS & MERCHANTS BANK OF
FOLEY, a Corporation,

Plaintiff,

-VS-

J. B. WILTERS,
Defendant.

STATE BANK OF ELBERTA, a
Corporation,
Garnishee,

HARRY J. WILTERS,
Claimant.

ANSWER OF PLAINTIFF TO CLAIM
OF HARRY J. WILTERS.

Filed August 19, 1936
Lo Duca
clerk

LLOYD A. MAGNEY
Attorney, Foley, Alabama.

FARMERS & MERCHANTS BANK
OF FOLEY,

Plaintiff,

VS.

J. B. WILTERS,

Defendant,

HARRY J. WILTERS, doing busi-
ness as J. B. Wilters & Co.,

Garnishee.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

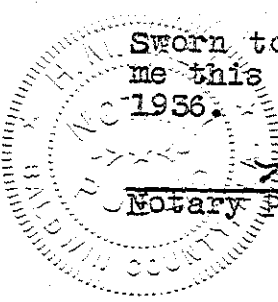
And now on this 11th day of September, 1936, comes HARRY J. WILTERS, who being duly sworn, deposes and says that for answer to said garnishment, that at the time of the service of said writ of garnishment and at the time of making this answer the said Garnishee, Harry J. Wilters, doing business as J. B. Wilters & Company, is not indebted to the said Defendant, J. B. Wilters, and that he will not be indebted to the said Defendant by contract then or now existing; that he will not be liable to said Defendant for the delivery of personal property or for the payment of money which will be discharged by the delivery of personal property, or which is payable in personal property, and that the Garnishee has not in his possession or under his control money or assets belonging to the Defendant, J. B. Wilters.

Having fully answered the said garnishment, the said Garnishee prays to be dismissed with his reasonable cause for making this answer.

Harry J. Wilters

Sworn to and subscribed before
me this 11 day of September,
1936.

W. H. H. H.
Notary Public, Baldwin County,
Alabama.



RECORDED
Duck
7-5-38

ANSWER TO GARNISHMENT

FARMERS & MERCHANTS BANK
OF FOLEY,

Plaintiff,

VS.

J. B. WILTERS,

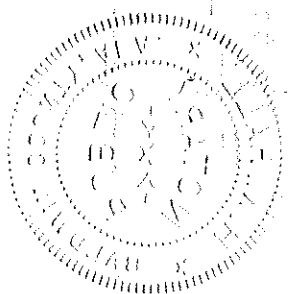
Defendant,

HARRY J. WILTERS, doing busi-
ness as J. B. Wilters & Co.,

Garnishee.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Filed Sept. 11, 1936.
R. S. Duck, clerk.



THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT

R S Duck.

Personally appeared before me, ~~THOMAS KITCHERSON~~, Clerk of the Circuit Court in and for Baldwin County and State aforesaid. Lloyd A Magney.

who being duly sworn, on oath says, that a regular Fall Term
of the Circuit Court of Baldwin County, to-wit: on the 21 st day of August
19233, Farmers & Merchants Bank of Foley
recovered a judgment against J B Wilters.

for the sum of
Twelve hundred forty nine and. 14/100 Dollars,
besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that
Harry J Wilters Doing business as J B Wilters & Co

supposed to be indebted to or have effects of the said J B Wilters
in his possession, or under his control, and that he believes process of
Garnishment against said J B Wilters.
is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 19th
day of August A. D. 1936

R S Duck

Clerk.

Lloyd A Magney

RECORDED

Dick

7-536

No. _____

CIRCUIT COURT

Farmers & Merchants Bank.
of Foley

-----Vs-----

J B Wilters.

VS.

Harry J Wilters. Doing business
as J B Wilters & Co.

Garnishee.

AFFIDAVIT

Filed in Office,

August 19th 1936

R. S. Dick

Clerk.

Gill Printing Co., Mobile, Ala.