

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-TIFF 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 here-tofore 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.

Stephensoney

Subscribed in my presence and sworn to before me this _///

Notary Public

7-13P

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

FARMERS & MERCHANTS BANK OF FOLEY, a Corporation,

Plaintiff hyas

vs-

J. B. WILTERS,

Defendant,

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

Garnishee Defendant.

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

Filia Sept, 4, 1934 Robbital

Attorney
Foley, Alabama.

Robertsdeler Ala

May 16th 1921

BILLOTSALE

Know all men by these presents, that I. John B Wilters, in consideration of the Sum of one thousand Dollars (\$1.000.00) and other Galuable 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 secarage situated on Milwaukee Street Robertsdale Alabama.

Also, one olds Mobile, one Maxwell, xxe one lold 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 leth day of May

1921

Jor B. Wilters

State of Alabama. County of Baldwin

Subscribed and sworn to before me this leth day of

May A.D.1921

Notary Public in and for said County & State

My Commission expires February 12, 1923

this Bill of sale made in Duplicate

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STATE OF ALABAMA, BALDWIN. COUNTY

IN THE CIRCUIT COURT

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the Cir	rcuit Court	to be hold	den for	Bal	dwiń.	***********	County, Alab	ama, and with	nin thirty days
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(Box 670-2) MARSHALL & BRUCE CO., NASHVILLE

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The State of Alabama, BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

August TERM, 19236

To Any Sheriff of the St	ate of Alabama—Greeti	ng:		
WHEREAS, At a re	gular Fall T	erm, 19 33 , of	the Circuit Court of Ba	ıldwin County,
to-wit: On the 21	day of A	gust	, 192 33 being a	regular day of
said term Farme	rs & Merchants Bar	k. of Fole	y.	
Salu (Clini				
recovered judgment against	J B Wilters.			
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for the sum of	welve hundred for	rty Nine ar	d 14/100. Dollars, a	
and affidavit having been that process of garnishmen following named persons o	t is believed to be necessar, corporations, viz:	y to obtain satis	faction of such Judgmen	it, and that the
Harryyr J Wilt	ers doing busines	s as J B Wi	lters & Co.	
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has or is believed to have		and the second s		
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fendantis, or are, liable to said de	by a contract then exist fendants for the delivery o delivery of personal propert	ing, and whether f personal proper cy, or which is pa	by a contract then existing ty, or for the payment ayable in personal proper	ng of money which ty, and whether
he has	not in his	possession or und	derc	ontrol money or
effects belonging to the de	efendant JBWi	lters.		
Herein fail not, and	I have you then and there $\mathbf{ck}ullet$	this Writ.		
Witness, TXXXXX	CHERSON , Clerk of said	Court, this	19th	
•	August			
-	day of Augu			<u>.</u>
	ATTEST:		RsDu	Clerk.

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VIIC	uit Court, Baldw	アージー3 in Count	ty
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Harr	yJ Wilters.Doing B Wilters & Co.	Busines	3
	19th day of Aug,	192 36	en deministra

Slafe a Mayney.

Attorney.

Gill Ptg. Co., Mobile

The State of Alabama, BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

Fall TERM, 19236

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has or is believed to have in _its	To Any Sheriff of	the State of A	.labama—Gree	eting:		
to-wit: On the 21 day of August 1925 being a regular day of said term. Farmers & Merchants Benk of Foley A Copporation. Tecovered judgment against J. B. Wilters. The word of 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 parnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or oerporations, viz: Elberta State Bank a Corporation. The word of them on 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. You are the mading in the making its money and the service of this Within 30days from the service of this writh the three first days of the term, to answer on oath, whether at the time of the service the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment, or at the time making its masser, or at any time intervening the time of serving the garnishment and making the answer. 1t was indebted to said defendant of 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 the has not in its possession or under 1ts control money or effects belonging to the defendant J. BWilters. Herein fail not,	WHEREAS,	At a regular	'all	Term, 192 33	, of the Circuit	Court of Baldwin Coun
recovered judgment against JB 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. Williers or that it is, or is believed to be indebted to said defendant JB Wilters or to be liable to them, or to one of them on 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 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. Within Sodays from the service of this With 10 100. Within Sodays from the service of the garnishment, or at the time making its answer, or at any time intervening the time of serving 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 indebted in future to said defendant JB Wilters. And whether by a contract then existing it. Herein fail not, and have you then and there this Writ. Robert S Duck. Witness, Wilters Clerk of said Court, this 24th. day of July A. D. 192. 36						
recovered judgment against						
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: **Riberta State Bank a Corporation.** **Riberta State Bank a Corporation.** **Riberta State Bank a Corporation.** **Bullters of the state belonging to said defendant J B Wilters of the state belonging to said defendant. J B Wilters of the state belonging to said defendant. J B Wilters of the same to 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 Biberta State Bank.** **You are Therefore Hereby Commanded to Summon Biberta 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 Mithin Sodays from the service of this Writh the ADD of the same of the service of the garnishment, or at the time making the answer on oath, whether at the time of the service of the garnishment and making the answer. It was indebted to said defendant J B Wilters. And whether it was indebted to said defendant J B. Wilters. And whether it was indebted to said defendant J B. Wilters. And whether it payable in personal property, and whether it has not in its possession or under its payable in personal property, and whether it has not in its possession or under its payable in personal property, and whether fields to said defendant J BWilters. **Herein fail not, and have you then and there this Writ. Robert S Duck.** **Witness, **ZOXYXXXXWXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX						
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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** **Biberta State Bank a Corporation** **Biberta State Bank a Corporation** **An or is believed to have in 1ts possession, or under 1tsits control money or effects belonging to said defendant J B Wiltersor 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. Within 30days from the service of this Wilt the City of Bay Minette, on the "Within 30days" from the service of this Wilt the capture of the garnishment, or at the time and there within the three first days of the term, do answer on oath, whether at the time of serving the garnishment and making the answer it was indebted to said defendant J B Wilters and whether it will not be indebted in future to said defendant J B Wilters and whether it will not be indebted in future to said defendant J B Wilters and whether it will not be indebted in future to said defendant J B Wilters and whether property, or which is payable in personal property, and whether it has not in its possession or under 15s 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 Witnes						
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has or is believed to have in 1ts possession, or under to be included 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. You are Therefore Hereby Commanded to Summon Elberta State Bank. Within 30days from the service of this Writhen 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 1ts answer, or at any time intervening the time of serving the garnishment and making the answer it will not be 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 1t has not in 1ts possession or under 1ts control money or effects belonging to the defendant J. BWilters. Herein fail not, and have you then and there this Writ. Robert S. Duck. Witness, Witness, Witness, Clerk of said Court, this 24th day of July A. D. 192.36						
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You are Therefore Hereby Commanded to Summon. Elberta State Bank. 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 Mithin 30days from the service of this Writhen 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 will not be 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 its, 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. BWilters. Herein fail not, and have you then and there this Writ. Robert S. Duck. Witness, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX			The second secon	1 N 1	and the second s	and the second s
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has not in its possession or under its control money or effects belonging to the defendant J BWilters Herein fail not, and have you then and there this Writ. Robert S Duck. Witness, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	is, or are, madre to sa	ud detellualits for	the delivery of	i personal proj	nerry, or tor the	Dayment of money which
Herein fail not, and have you then and there this Writ. Robert S Duck. Witness, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX						
Robert S Duck. Witness, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX						-
day of July A. D. 192. 36	Ro	bert S Ducl	k.		0.443	
Company 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						_
Issued	ssuedJu.	. y 24th day o			A. I). 192 .3.6
ATTEST: Clerk.			ATTEST:		Pales	Dela Clerk

RECORDED 7-534

Circuit Court, Baldwin County

No.290

Farmers & Merchants Bank. a Corporation.

VS. } GARNISHMENT ON JUDGMENT

J B Wilters.

M. H. Wilkins Sherill By C. V. anderson party Sherill

Elberta State Bank.a Corp.

Issued 24th day of July 19236

Returnable day of 192

Attorney.

Gill Ptg. Co., Mobile

STATE OF ALABAMA, Baldwin. COUNTY

IN THE CIRCUIT COURT

Fall Term, 19 ³⁶	
Term, 19	
Farmers & 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 I.B. Wilters.	
or have effects of the said JB Wilters. in its	
possession or under control and that believe S that process of ga	ır-
nishment is	.in
satisfaction of said judgment.	
That Writ of Garnishment has this day been issued to the said Elberta State Bank.	
commanding 1t to be and appear before	re
the Circuit Court to be holden for Baldwin County, Alabama, and within thirty da	
after service thereof, then and there to answer on oath whatit is indebted to sa	aid
J B Wilters. at the time of service of this Writ of Garnishme	nt.
or at the time of makingits answer, and whetherit will not be indebt	;ea
in future to JB Wiltersby a contract then existing, and whether it have not	in
its possession or underits control personal or real property or things in action	be-
longing to defendant B Wilters.	
Witness my hand this the 24th day of July , 19 36	
Return Cle	rk.

STATE OF ALABAMA

...COUNTY

CIRCUIT COURT

Farmers & Merchants Bank

Plaintiff.

VS.

J.B. Wilters.

Defendant.

Elberta State Bank a Corp Garnishee.

Notice to Defendant of Issuing Garnishment

Llayd A Magney

Attorney.

(Box 670-2) MARSHALL & BRUCE CO., HASHVILLE

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FARMERS & MERCHANTS BANK of FOLEY, a corporation,

Plaintiff,

.

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 serwice 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.

Note Duck

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

Rec in Right

Executed by serving a copy of the within on

Harry Wilters 8/4/36

M. H. Wilkins, Sheriff.

By Lornie Briens D.S

FARMERS & MERCHANTS BANK of Foley, a corporation,

Plaintiff,

J. B. WILTERS.

Defendant,

STATE BANK OF ELBERTA, a Corporation,

Garnishee Defendant.

NOTICE TO SUGGESTED CLAIMANT

Filed august 1st 1930 Calustination

Attorney
Foley, Alabama.

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)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

CONTEST OF ANSWER OF GARNISHEE

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

Subscribed in my presence and sworn to before me this $\frac{1 \text{ } V}{4}$

Notary Public

RECOLDED 7-538

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 business as J. B. WILTERS & COM-PANY, Garnsihee Defendant.

CONTEST OF ANSWER OF GARNISHEE

Filid lept 149984

LLOYD A. MAGNEY
Attorney
Foley Alabama.

THE STATE OF ALABAMA.)

FARIMRE AND MARCHANTS)
BANK.FOLMY.ALABAMA.
PLAINTIFF.

** VS **

J.B.WILTERS. Defendant.

STATE BANK OF ELBERTA) ELBERTA.ALA.) GARWISHEE. In The Circuit Court of Baldwin County,

In the Circuit Court of Baldwin County, Mabama, 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 anver 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--- (51366.22) 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

Having made rull and true answer to this writ, the garmishee prays that it be discharged with its reasonable costs. SWORM to and subscribed before me this the 27th.day of July,1936

Notary Public, Baldyn County, Ala.

State Bank of Miberta, Alabama.

Cashier.

Merch J-535

Film July 28 1934 Debu Seled FARMERS & MERCHANTS BANK OF FOLEY,) a Corporation,

Plaintiff,

J. B. WILTERS,

Defendant.

ELBERTA STATE BANK, a Corporation, Garnishee,

Defendant.

AFFIDAVIT FOR GARNISHMENT ON JUDGMENT

IN THE CIRCUIT COURT OF

COUNTY

No.

STATE OF ALABAMA) BALDWIN COUNTY)

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.

Subscribed in my presence and sworn to before me this 23rd

day of July, 1936.

IN THE CIRCUIT COURT OF

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

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

> LLOYD A. MAGNEY Attorney Foley, Alabama.

FARIERS & MERCHANTS BANK OF FOLEY, a Corporation,

Plaintiff,

VS.

J. B. WILTERS,

Defendant.

IN THE CIRCUIT COURT OF BAIDWIN COUNTY, ALABAMA,

-MO: 9779.

STATE OF ALABAMA, BALDWIN COURTY.

Before me, H. M. Hall, a Motary Public, in and for said County, in said State, personally appeared MARRY 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 Sinty-six and 22/100 (§1566.22) Bollars, on deposit in the State Bank of Elberta in the name of J. B. Wilters & Company, J. B. Wilters, Manager, and against which a garmishment was issued in the above stated cause and served on the State Bank of Elberta, a Corporation, as Garmishee, and which Garmishee 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, Marry J. Wilters, and that the affiant has a just claim to the money so garmished.

Sworm to and subscribed before ne this sth day of Lugust, 1936.

Nogazy Public, Baldwin County,

Harry A. Willen

LATH OF HARRY J. WILTERS

FARMERS & FERCHANTS BANK, OF FOLLY, a Corporation,

Plaintiff,

VS.

J. B. VILTERS,

Defendant.

III THE CIROUTT COURT OF

BAIDWEE COUNTY, ALABATA,

AT LAW, MO. 9779.

Diled August 5, 1936 R. S. Duck, Clark A. D. Marinin

Circuit bourt Daldwin bounty. Law # 290. Farmus & Merchants Back of Foly. Plaintiff Demurrer to blaim. His de liters aluft. State Bauk of Elberta Garnisher Harry Jew ellers Claimout Claim of Harry & Willess and as grounds for such demurrer saip: 1. No facto are averred as the basis for Raid 7. The claim states mere condusions rather than facts upon which issue may be taken. 3. The claim sets forth no facto showing a right in the claimout to the property. Slapationagney aty frold.

Law# 790. RECORDED 7.536 Fr m Bank of Foley How illes Elauta State Beuk Garnisher Harry & Wilters Claimant Demurrer la clavin,

Tild August 18 1936 R & Duch Obel

Skeyd a Magney allowey for Pef.

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.

Filis Oureur 19 193h Correct/

LLOYD A. MAGNEY Attorney, Foley, Alabama. FARMERS & MERCHANTS BANK OF FOLEY,

Plaintiff,

VS.

J. B. WILTERS,

Defendant,

HARRY J. WILTERS, doing business as J. B. Wilters & Co.,

Garnishee.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

And now on this lith day of September, 1936, comes HARRY J. WILTERS, who being duly sworm, 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.

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

Yotary Public, Baldwin County,

ANSWER TO GARNISHMENT

FARMERS & MERCHANTS BANK OF FOLEY,

Plaintiff,

VS.

J. B. WILTERS,

Defendant,

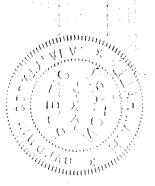
HARRY J. WILTERS, doing business as J. B. Wilters & Co.,

Garnishee.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Filed Sept. 11, 1936.

R. S. Duck, clark.



THE STATE OF ALABAMA, }

CIRCUIT COURT

RS Duck.

Personally appeared before me, TXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	or Rolden C.
State aforesaid. Lloyd A Magney.	or Baldwin County and
who being duly sworn, on oath says, that a regularFell	Term
of the Circuit Court of Baldwin County, to-wit: on the 21 stday of _August	4.00
19233, Farmers & Merchants Bank of Foley	
recovered a judgment against J B Wilters.	**************************************
	for the sum of
Twelve hundred forty nine and. 14/100	
besides costs of suit; that said judgment remains wholly unsatisfied and in full fo 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. 136	agrey.
day of August A. D. 136	

RECORDED Auck

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CIRCUIT COURT

Farmers & Merchants Bank. of Foley

J B Wilters.

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

VS.

Garnishee.

AFFIDAVIT

Filed in Office,

Raderah

Gill Printing Co., Mobile, Ala.

-August 19th

Clerk.