

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

352

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MOBILE FERTILIZER COMPANY, a Corporation, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County, at the place of holding the same, then and there to answer the Complaint of J. J. GANUS.

WITNESS my hand this 4 day of May, 1937.

D. S. Duck  
Clerk.

J. J. GANUS,  
Plaintiff,  
VS.  
MOBILE FERTILIZER COM-  
PANY, a Corporation,  
Defendant.

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

1. The Plaintiff claims of the Defendant SEVENTY-FIVE (\$75.00) dollars due from it by account, on to-wit, April 1st, 1937.
2. The Plaintiff claims of the Defendant SEVENTY-FIVE (\$75.00) DOLLARS due from it on account stated between the Plaintiff and Defendant, on to-wit, the 1st day of April, 1937.
3. The Plaintiff claims of the Defendant SEVENTY-FIVE (\$75.00) DOLLARS due from it for work and labor done for the Defendant by the Plaintiff, on to-wit, during the latter part of the year 1936 and the early part of 1937, at its request.
4. The Plaintiff claims of the Defendant SEVENTY-FIVE (\$75.00) DOLLARS due from it for money, on to-wit, the 1st day of April, 1937, received by the Defendant to the use of the Plaintiff.

Which sums of money, with the interest thereon, are still due and unpaid.

Becher & Hall  
Attorneys for the Plaintiff.

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RECORDED  
JUN 11 1937  
Duch  
8-66

SUMMONS AND COMPLAINT

J. J. GANUS,

Plaintiff,

VS.

MOBILE FERTILIZER COMPANY,  
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Filed May 4 1937  
R. L. Duch

Received 8 Day of May 1937  
and on 11 Day of May 1937  
I served a Copy of the within  
on Mobile Fertilizer Company  
by service on Oratun Ballan  
as single  
R. L. HOLCOMBE, Sr., Sheriff  
R. L. Lamm D.S.

J. J. GANUS,

Plaintiff,

VS.

MOBILE FERTILIZER COMPANY,  
a Corporation,

Defendant.

R. B. WILLIAMSON and  
LOXLEY FARMERS UNION CO-OP.,  
INC.,

Garnishees.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 352.

NOTICE TO DEFENDANT OF ISSUING GARNISHMENT.

TO MOBILE FERTILIZER COMPANY, a Corporation:

You will take notice that affidavit having been made in the above stated cause, that R. B. Williamson and Loxley Farmers Union Co-op., Inc., are supposed to be indebted to the said defendant, Mobile Fertilizer Company, a Corporation, or have effects of the said Mobile Fertilizer Company, a Corporation in their possession or under their control and that it is believed that process of garnishment is necessary against said R. B. Williamson and Loxley Farmers Union Co-op., Inc., to obtain satisfaction of said judgment.

That Writ of Garnishment has this day been issued to the said R. B. Williamson and Loxley Farmers Union Co-op., Inc., commanding them to be and appear before the Circuit Court to be holden for Baldwin County, Alabama, and within thirty days after service thereof, then and there to answer on oath what they are indebted to said Mobile Fertilizer Company, a Corporation, at the time of service of this Writ of Garnishment, or at the time of making their answer, and whether they will not be indebted in future to Mobile Fertilizer Company, a Corporation, by a contract then existing, and whether they have not in their possession or under their control personal or real property or things in action belonging to defendant, Mobile Fertilizer Company, a Corporation.

WITNESS my hand this the 4<sup>th</sup> day of May, 1937.

R. E. Duck  
Clerk.

255

NOTICE TO DEFENDANT.

*farmer*  
*Duck*  
*8-68*

RECORDED

J. J. GANUS,

Plaintiff,

VS.

MOBILE FERTILIZER COMPANY,  
a Corporation,

Defendant.

R. B. WILLIAMSON and  
LOXLEY FARMERS UNION CO-OP,  
INC.,

Garnishees.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 352.

Issued this 4<sup>th</sup> day of May,  
1937.

Received 8 Day of May 1937  
and on 11 Day of May 1937  
I served a copy of the within  
on Mobile Fertilizer Co., a  
corp.

by service on Walter Batten  
as agent  
F. L. HOLCOMBE, Sr., Sheriff  
By A. L. Farmer D. S.

BOND

The State of Alabama,  
Baldwin County.

*Circuit*  
JUSTICE COURT

Know All Men By These Presents:

That we, J. J. Ganus. J. W. Bystricky, and

Peter Labissoniere.

are held and firmly bound unto Mobile Fertilizer Co. W. W. Bolton Mgr.

in the sum of One Hundred Fifty. & 00/100 Dollars, to  
be paid to the said Mobile Fertilizer Co. W. W. Bolton Mgr.  
their

heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals and dated the 1st day of May, 1937, ~~1938~~

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound

J. J. Ganus.

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said Mobile Fertilizer Co.

W. W. Bolton Mgr.

in the sum of Seventy-five, & 00/100 Dollars,

and has on the day of date hereof, prayed that Writ of Garnishment issue out of said Court to R. B. Williamson, & Loxley Farmers Union Co-op, Inc.

summoning them to answer what they are indebted to said Defendant, or what effects of said Defendant they have in their possession, or under their

control: and said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as they may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void: otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claim of exemption we or either of us have now, or may hereafter have, under the Constitution and Laws of Alabama, and we hereby severally certify that we have property free from all incumbrance, to the full amount of the above bond.

J. J. Ganus. (SEAL)  
J. W. Bystricky SEAL  
Peter Labissoniere SEAL

Approved this 3 day of May, A. D., 1937

Ps Duct Atty

**The State of Alabama,** }  
 Baldwin County

**CIRCUIT COURT**

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

Whereas J. J. GANUS

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court of said County, against MOBILE FERTILIZER COMPANY, a Corporation,

for the sum of SEVENTY-FIVE & NO/100 (\$75.00) Dollars and whereas, the said

has entered into bond, and made affidavit as required by law that the said

MOBILE FERTILIZER COMPANY, a Corporation,

is indebted to him in the sum of SEVENTY-FIVE & NO/100 (\$75.00)

Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that R. B. Williamson and Loxley

Farmers Union Co-op. Inc.,

<sup>are</sup>  
~~is~~ believed to be chargeable as garnishees in the cause.

YOU ARE THEREFORE, commanded to summon the said R. B. Williamson

and Loxley Farmers Union Co-op. Inc.,

service  
 to be and appear ~~xxxxx~~ within thirty days from term of the Circuit Court, to

be holden for the County of Baldwin, on \_\_\_\_\_ 192\_\_\_\_, then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you will not be indebted to him in the future by a contract then existing, and whether by a contract then existing, you are liable to him 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 you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 4th day of May, 1927

R. L. Duck

Clerk.

May 7. 1937  
by serving copy of within Summons and  
Complaint on

R. B. Williamson  
Litzner as  
of Lofley Farm  
Union Co. Ala.  
M. H. Wilkins Sheriff  
C. N. Anderson Deputy Sheriff

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RECORDED  
No. 352

Dusk  
8:07

Circuit Court of Baldwin County

J. J. GANUS,  
Plaintiff,  
vs. } GARNISHMENT ON SUMMONS

MOBILE FERTILIZER COMPANY,  
a Corporation,  
Defendant.

Issued 4th day of May 1937

Beebe Hall, Beebe  
Plaintiff's Attorney

Moore Printing Co. Bay Minette, Ala.