

J. T. Blackburn
Attorney for Plaintiff.

An itemized statement of the account here sued on, verified by the affidavit of a competent witness is hereto attached.

J. T. Blackburn
Attorney for Plaintiff.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to notify W. E. Dees, Defendant in the within stated cause, that a Writ of Garnishment was, this day, issued from this court to Hartford Fire Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fire Insurance Company, and Minnesota Implement Mutual Fire Insurance Company, as Garnishees, for the sum of \$256.67 debt and damages, and costs expended in said cause.

Witness my hand this 16 day of September, 1938.

R. S. Duck

Clerk, Circuit Court, Baldwin County, Alabama.

By: Sandberg Thompson, Deputy

R. S. Duck
RECORDED *Duck*
8-22-38

SUMMONS AND COMPLAINT.

THE PACE COMPANY, a Corporation,

Plaintiff,

VS.

W. E. DEES,

Defendant.

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

Filed September 16, 1938
R. S. Duck, Clerk
By: Sandberg Thompson, Deputy

Executed this 17th
day of Sept, 1938,

by sending copy of the

within summons &

complaint on

W. E. Dees, defendant

W. R. Moore
Sheriff Circuit Co

December 17, 1936.

Hartford Fire Insurance Company, Inc.,
C/o Messrs. McCorvey, McLeod, Turner & Rogers,
Mobile, Alabama.

Re: Mobile Cigar & Tobacco Co., vs.
W. E. Dees, Et Al., At Law #477.

Gentlemen:

Re: The Pace Co., a Corporation, vs.
W. E. Dees; Hartford Fire Insurance
Company, Inc., as Garnishee.

This is to advise you that Bond has been filed by the Defendant, which has been duly approved by me, in the Mobile Cigar & Tobacco Company case, in accordance with Section 8064, and that the Garnishment in this case has been dissolved and the garnishee discharged.

This is also to notify you that the suit of the Pace Company, a Corporation, vs. W. E. Dees, as Defendant; The Hartford Fire Insurance Company, Garnishee, has been dismissed by the Plaintiff and the Plaintiff taxed with the costs of the proceedings, and consequently the garnishee is discharged.

Yours very truly,

R. S. DUCK, Clerk,

By:

Deputy Clerk.

t/

STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA; GREETING:

WHEREAS, the Pace Company, a Corporation, has commenced suit by Summons and Complaint, returnable to the Circuit Court of Baldwin County, Alabama, against W. E. Dees, Defendant, for the sum of \$256.67, and has made affidavit and given bond as required by law:

These are therefore, to command you, that you summon Hartford Fire Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fire Insurance Company, and Minnesota Implement Mutual Fire Insurance Company to be and appear within thirty days from the service of this process, then and there to answer, on oath, whether at the time of the service of the garnishment, or at the time of making their answer, or at any time intervening the time of serving the garnishment and making the answer, they, or either of them, are indebted to the Defendant, and whether they or either of them, will not be indebted in future to said Defendant by a contract then existing and whether by a contract then existing, they, or either of them will be liable to the said Defendant 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 they or either of them have not in their possession or under their control, money or effects belonging to the said Defendant.

WITNESS my hand this 16 day of September, 1938.

R. S. Dush
Clerk of Circuit Court.

By: Handwritten Signature
DEPUTY

RECORDED
Duch
8-279

417

WRIT OF GARNISHMENT.

THE PAGE COMPANY, a Corporation,

Plaintiff.

vs.

W. E. D FES,

Defendant.

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

RECEIVED IN OFFICE
SEP 26 1938
Hartford Postoffice, Hartford, Maine

EXECUTED BY DELIVERING
a copy of the within

Robert Morris
AS *State Agent*
OF THE *Hartford* DISTRICT COURT
AND SAID *H. J. Morris*
WAS SUCH WHEN SO SERVED *9/26/38*
My good Paterson
Sheriff Montgomery County
Wampful Deputy Sheriff

ROBERTSDALE COPY

PACEMAKER PATENT NO. 1554275 - AM. SALES BOOK CO., INC., NIAGARA FALLS, N.Y.

CREDIT O. K. **THE PACE COMPANY** No. _____
 ROBERTSDALE, ALABAMA
 Salesman _____ Date Sold 7/8/35
 Sold to Dees Merc Co
 Shipping Point City
 Ship via _____ P. O. _____

Register Numbers **2280**
 DATE BILLED _____
 Ledger _____

PACEMAKER **DIAMOND P**

Shipper's Check	Quantity	Terms	WEIGHT	PRICE	Salesman Must Not Use These Columns
	1	100 th Program			2500
		10%			250
					2250
		Factory Shipment			
		3			
		"IF WE SELL IT, IT'S GOOD"		TOTAL	

OUT O. K.

THE PACE COMPANY

ROBERTSDALE, ALABAMA

No.

Register Numbers

3299

DATE BILLED

Salesman

Date Sold

8/2/38

Sold to

J. E. Dees
City

Shipping Point

Ship via

P. O.

DIAMOND P

Ledger

TEMAKER

ROBERTSDALE COPY

FEMPACT PATENT NO. 1554476 - AN. PACE BOOK CO., INC., NIAGARA FALLS, N. Y.

Shipper's Check	Quantity	Terms	WEIGHT	PRICE	Salesman Must Not Use These Columns
	1	Cr Suet Pk			2 95
	1	Dz Pmt Salmon		1 25	2 50
	1	Sv 100 Sugar			4 40
	1	10/10			1 25
	1	Dz Conf Sugar			90
	1	PK			1 25
	1	Cr 48/1 Saco			5 30
	1	B 24 Pk Svc			4 25
	1	48			4 55
					5 185
	30	Cherries			3
		Dees Merc.			
		"IF WE SELL IT, IT'S GOOD"	TOTAL		

CREDIT O. K.

THE PACE COMPANY

ROBERTSDALE, ALA.

No. *8/19/38*

Register Numbers

DATE BILLED

Salesman *W. E. Deeb* Date Sold

DIAMOND P.

Sold to *City*

PACEMAKER

Shipping Point

LEDGER

Ship via _____ P. O. _____

Shipper's Check	Quantity	TERMS	Weight	Price	Salesmen Must Not Use These Columns					
X	1	100 Sugar								465
X	1	10/100								475
X	1	26 4/8 Beans								530
X	1	12 1/4								520
X	1	26 4/8 OY Beans		4 7/8						190
X	1	30		85						170
X	1	27 1/2								225
X	1	48 1/2 Mutton		50						200
X	1	40 Mutton								180
X	1	26 1/2 Beans								165
X	50	# Head Beans		06						300
X	50	# B L Beans		4 1/2						225
X	50	# Mutton		4 1/2						225
X	50	# B L Beans		4 1/2						225
X	1	26 mutton		95						380
X	1	1/4 Cocoa								145

"IF WE SELL IT, IT'S GOOD"

Deeb

4620

ROBERTSDALE COPY

FACSIMILE PATENT NO. 1224478 - AN. SALES BOOK CO., INC., NIAGARA FALLS, N.Y.

CREDIT O. K.	THE PACE COMPANY		No. _____	Register Numbers	4191	
	ROBERTSDALE, ALABAMA		Date Sold <u>4/27/35</u>		DATE BILLED	
	Salesman _____	<i>W. E. Deery</i>			DIAMOND P	Ledger
	Sold to _____					
Shipping Point _____	<i>City</i>					
Ship via _____	P. O. _____					

Shipper's Check	Quantity	Terms	WEIGHT	PRICE	Salesman Must Not Use These Columns
	1	cs 4 1/2 lb Sun Glace		145	580
	4 1/2	lb Meal		190	85
	1	cs Sun Curot			190
	1	cs 1/2 5 PS BK Pump			225
	1	cs a d Fruit			160
	3	lb Sugar		460	1380
	1	✓ 10/10			475
	3	BX Sun		65	195
	1	bc 30 lb Spaghetti			95
	1	bc 24 Sugar SR.			575
	1/2	✓ 24 PL		550	275
	1/2	✓ 17 SR		6	300
	1	✓ 24 PL SW			425
	1	✓ 48			455
	1	cs S P Matches			450
	1	cs 4 1/2 Tooth picks			160
		"IF WE SELL IT, IT'S GOOD"	TOTAL		6025

CREDIT O. K.

THE PACE COMPANY

ROBERTSDALE, ALABAMA

No.

Register Number

4190

DATE BILLED

Salesman

Date Sold

Sold to

Shipping Point

Ship via

P. O.

DIAMOND P

Ledger

PACEMAKER

ROBERTSDALE COPY

PATENT NO. 1525479 - AN. SALES BOOK CO., INC. - NIAGARA FALLS, N.Y.

Shipper's Check	Quantity	Terms	WEIGHT	PRICE	Salesman Must Not Use These Columns	
	1	CO 50 each				250
	1	1/2 off				525
	1	1/2 off				535
	1	1/2 off				480
	1	Red W/ Matches				1710
3						
"IF WE SELL IT, IT'S GOOD"						
				TOTAL		

Filed September 16, 1938
R.S. Buck, Clerk
For: Members (Thompson)
Osgood

RECORDED

AFFIDAVIT.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared J. W. Brett, Jr., who, after being by me first duly and legally sworn, deposes and says: That he is manager of the business operated by The Pace Company, a Corporation, at Robertsdale, Baldwin County, Alabama; that he is duly authorized to make this affidavit for and on behalf of the said corporation; that he has personal knowledge of the attached account that is due and owing the said The Pace Company by W. E. Dees; that the same is true, correct, justly due and unpaid

J W Brett Jr

Sworn to and subscribed before me on this the 10th day of September, 1938.

Ora Simon

Notary Public, Baldwin County, Alabama.

AFFIDAVIT.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority within and for said County in said State, personally appeared J. W. Brett, who, being by me duly sworn, doth depose and say: That he is manager of the branch of The Pace Company, a Corporation, located at Robertsdale, in Baldwin County, Alabama, and is the agent of the said corporation duly authorized to make this affidavit; that W. E. Dees is indebted to the said The Pace Company, a Corporation, in the sum of \$256.67 for the recovery of which it has commenced suit by Summons and Complaint now pending in the Circuit Court of Baldwin County, Alabama, against the said W. E. Dees, and that he believes process of garnishment against Hartford^{Fire} Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fire Insurance Company, and Minnesota Implement Mutual Fire Insurance Company is necessary to obtain satisfaction of the said indebtedness and that the said Hartford Fire Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fires Insurance Company and Minnesota Implement Mutual Fire Insurance Company are supposed to be indebted to the said W. E. Dees or have effects of the said Defendant in their possession or under their control.

J. W. Brett Jr.

Sworn to and Subscribed before me
on this the 10th day of September, 1938.

Orsa Simmon

Notary Public, Baldwin County, Alabama.

RECORDED

Bluck
8-298

GARNISHMENT AFFIDAVIT.

THE PACE COMPANY, a Corporation,

Plaintiff,

VS.

W. E. DEES,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____.

Filed September 16, 1938

R. S. DUCK

clerk, - register

By *W. H. H. H. H. H.*
Deputy

GARNISHMENT BOND.

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That we, The Pace Company, a Corporation, as Principal, and J. W. Burt Jr. and W. D. White, as Sureties, are held and firmly bound unto the said W. E. Dees in the sum of \$515.00, for the payment of which well and truly to be made, the principal binds itself, its successors and assigns, and the sureties bind themselves, their heirs and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this the 10th day of September, 1938.

The condition of the above obligation is such, that whereas the above bound The Pace Company, hath brought a suit, now pending, against the said W. E. Dees in the Circuit Court of Baldwin County, Alabama, to recover of the said W. E. Dees, the sum of \$256.67, and has this day prayed that a writ of garnishment issue to Hartford Fire Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fire Insurance Company, and Minnesota Implement Mutual Fire Insurance Company to answer what they are indebted to or what effects of said defendant they have in their possession or under their control, and said plaintiff having made oath and entered into this bond as required by law, has obtained said writ of garnishment, returnable to the next term of said Court.

Now, if the said plaintiff shall prosecute its said suit to effect and pay the defendant all such damages as he may sustain by the wrongful or vexatious suing out of said garnishment, then this obligation to be void, otherwise to remain in full force

and effect.

THE PACE COMPANY, a Corporation, (SEAL)

By J N Brett Jr
As its duly authorized agent.

As Principal.

J N Brett Jr (SEAL)

W White (SEAL)

As Sureties.

Taken and approved this 16 day of
September, 1938.

R L Dancy

Clerk of the Circuit Court.

RECORDED *Duck*
8-2899

GARNISHMENT BOND.

THE PAGE COMPANY, a Corporation,

Plaintiff,

VS.

W. E. DEES,

Defendant.

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

Filed September 16, 1938

R. S. DUCK

clerk, - register

By *Walter H. Henson*
Deputy

GARNISHEE'S SUPPLEMENTAL ANSWER

STATE OF ALABAMA, BALDWIN COUNTY.

The Pace Company, a cor- :
poration, :
Plaintiff, :
vs. :
W. E. Dees, :
Defendant, :
Hartford Fire Insurance Com- :
pany, a corporation, :
Garnishee. :

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

Personally appeared before me, Myrtle C. Lassett,
a Notary Public in and for the aforesaid State and County, A. B.
Frese, who, on oath, answers to the writ of garnishment issued
in this cause against Hartford Fire Insurance Company and served
on Baldwin County Insurance Agency, as agent of Hartford Fire
Insurance Company, and on H. J. Morris, Special Agent of Hart-
ford Fire Insurance Company, in Montgomery, Alabama, and, on
oath, says that he is the local representative of Fire Companies
Adjustment Bureau and in that capacity duly authorized to make
answer on behalf of Hartford Fire Insurance Company, a cor-
poration, to the garnishment served on its agents; that in the
answer previously made it was stated that it had not been
definitely established that the garnishee was indebted to
the defendant in any amount; that at the time of making this
supplemental answer the garnishee admits its indebtedness to
W. E. Dees in the sum of \$1,630.60 less \$25.80 due it by the
said W. E. Dees as the premium on its policy of fire insur-
ance, - making its indebtedness to the said W. E. Dees \$1,606.80;
that this sum will be held subject to the order of this Court
until this litigation is finally disposed of, or until such
time as the garnishee is advised by the proper officials of
this Court that a satisfactory adjustment has been made.

Subscribed and sworn to before me
this 10th day of October, 1938.

Myrtle C. Lassett
Notary Public, Mobile County, Alabama.

Hartford Fire Ins. Co. of Hartford, Conn.
by: Fire Companies' Ad. Bureau, Inc.
by A. J. St. Rose, Adjuster

Recd
8-288

Handwritten Supplemental Census

Filed October 13, 1938

R. S. DUCK

clerk, register

W. H. Thompson

GARNISHEE'S ANSWER

STATE OF ALABAMA, BALDWIN COUNTY.

The Pace Company, a cor- :
poration, :
Plaintiff, :
vs. :
W. E. Dees, :
Defendant, :
Hartford Fire Insurance Com- :
pany, a corporation, :
Garnishee. :

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

Personally appeared before me, Quinn G. Pugh,
a Notary Public in and for the aforesaid State and County, A. B.
Frese, who, on oath, answers to the writ of garnishment issued
in this cause against Hartford Fire Insurance Company and served
on Baldwin County Insurance Agency, as agent of Hartford Fire
Insurance Company, and on H. J. Morris, Special Agent of Hart-
ford Fire Insurance Company, in Montgomery, Alabama, and, on
oath, says that he is the local representative of Fire Companies
Adjustment Bureau and in that capacity duly authorized to make
answer on behalf of Hartford Fire Insurance Company, a cor-
poration, to the garnishment served on its agents; that at
the time of making this answer it has not been definitely de-
termined that Hartford Fire Insurance Company, a corporation,
is indebted to W. E. Dees, the defendant in the above styled
cause, in any amount,- any indebtedness moving from Hart-
ford Fire Insurance Company, a corporation, to W. E. Dees
being based on a fire loss which occurred on, to-wit, the
28th day of August, 1938; that at the time of making this
answer the investigation has not been completed and it is
therefore impossible for Hartford Fire Insurance Company,
a corporation, to answer that it is now indebted or will
be indebted in the future to the said W. E. Dees; that in
event it is established Hartford Fire Insurance Company, a

Duck
RECORDED 8-280

CARLISLE'S ANSWER.

Filed September 30th, 1938,

R. S. DUCK, Clerk,
By: *Handwritten Signature* Deputy-Clerk.

Handwritten signature

470

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, The Pace Company, a Corporation, has commenced suit by Summons and Complaint, returnable to the Circuit Court of Baldwin County, Alabama, against W. E. Dees, Defendant, for the sum of \$256.67, and has made the affidavit and given bond as required by law.

These are therefore, to command you, that you summon ✓ Hartford Fire Insurance Company, a Corporation, Federal Hardware and Implement Mutuals, Hardware Mutual Fire Insurance Company of Minnesota, Hardware Dealers Mutual Fire Insurance Company, and Minnesota Implement Mutual Fire Insurance Company to be and appear within thirty days from the service of this process, then and there to answer, on oath, whether at the time of the service of the garnishment, or at the time of making their answer, or at any time intervening the time of serving the garnishment and making the answer, they, or either of them are indebted to the Defendant, and whether they or either of them will not be indebted in future to said Defendant by a contract then existing and whether by a contract then existing they, or either of them will be liable to the said Defendant 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 they or either of them have not in their possession or under their control, money or effects belonging to the said Defendant.

Witness my hand this 16 day of September, 1938.

R. S. Duck

Clerk of Circuit Court.

By: *Handwritten Signature*, Deputy

RECORDED
247/1
5-288
Burdell
Barnhart

WRIT OF GARNISHMENT.

THE PACE COMPANY, a Corporation,
Plaintiff,

VS.

W. E. DEES,
Defendant.

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

9/12/38
Pace
113 66 James St

199

Executed this 22nd day of September 1938 by serving a copy of the within writ on R. H. Pratt as agent for the Federal Hardware & Implement Mutual, and also a copy ^{on} R. H. Pratt as agent for Hardware Mutual Co. of Minn., and a copy served on R. H. Pratt as agent for a Hardware Dealers Mutual Fire Co., and a copy served on R. H. Pratt as agent for the Minn. Implement Mutual Fire Co.

R. L. Holcombe Sheriff
BY: John R. Davis D.S.

Executed this 23rd day of September 1938 by serving a copy of the within writ on O. K. Cummings as agent for the Hartford Fire Insurance Company.

M. H. Wilkins, Sheriff
BY: John R. Davis
John R. Davis, D. S.

STATEMENT
HE PACE COMPANY
 WHOLESALE GROCERS

Robertsdale, Ala.

9/9/38

W. E. Dees
 Robertsdale Ala.

DATE	CHARGES	DATE	CREDITS
	.00 *		
JUL 8	22.50		
AUG 2	31.85		
9	20.78		
16	16.30		
20	46.20		
20	2.82		
20	20.15		
22	60.75		
22	17.10		
29	6.65		
	11.57		
	256.67 *		