

MORGAN A. LOVELL,

Plaintiff,

VS.

W. NORRIS, also known as  
WINIFRED NORRIS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER 822

GARNISEMENT BY SHERIFF ON ATTACHMENT

STATE OF ALABAMA

BALDWIN COUNTY

TO THE TRAVELERS INSURANCE COMPANY, A CORPORATION:

WHEREAS, a suit has been commenced by a Writ of Attachment in the Circuit Court of Baldwin County, Alabama, Law Side, wherein Morgan A. Lovell is Plaintiff and W. Norris, also known as Winifred Norris, is Defendant, for the sum of Two Thousand Dollars (\$2,000.00) which Writ of Attachment has been placed in my hands for the due execution thereof:

You are therefore commanded to be and appear before the Circuit Court of Baldwin County, Alabama, Law Side, within thirty days from service of this writ, then and there to answer on oath what you are indebted to the said Defendant at the time of the service of this Writ of Garnishment or at the time of making your answer and whether you will not be indebted in future to him by a contract now existing and whether you have not in your possession or under your control personal or real property or things in action belonging to the said Defendant.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal as Sheriff of Baldwin County, Alabama on this the 30th day of September, 1943.

W R Stuart  
Sheriff, Baldwin County, Alabama.

RECEIVED BY DELIVERING  
A copy of the within

10/23/43

TO Frank N. Williams  
OF THE State of Alabama  
AND SAID Frank N. Williams

WAS SUCH WHEN SO SERVED

Sheriff Montgomery County

Deputy Sheriff

September

my seat as Sheriff of Baldwin County, Alabama, on the 20th day of

longing to the said Defendant.

under your control, possession or best property or anything in your possession or

control for extension of time for your possession or

control and whether you will not be interested in the same

seizure of this writ of attachment on the part of the

must you are interested in the said Defendant, and

only from seizure of your wife, then and there to

County Court of Baldwin County, Alabama, then and there

don and therefore commenced to be and arrest before the

execution thereof:

which writ of attachment has been placed in my hands for the

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

MORGAN A. LOVELL is Plaintiff and W. NORRIS, also known as

W. NORRIS, also known as Defendant, in the County Court of Baldwin County, Alabama, then and there

months, as Defendant, for the sum of TWO THOUSAND DOLLARS (\$2,000.00)

822

RECORDED

GARNISHMENT BY SHERIFF ON  
ATTACHMENT.

MORGAN A. LOVELL,

Plaintiff,

VS.

W. NORRIS, also known as  
Winfred Norris,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER 822

Defendant.

MORGAN A. LOVELL

AS

Plaintiff.

MORGAN A. LOVELL

VS.

NUMBER 822

BALDWIN COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

GARNISHEE'S ANSWER

STATE OF ALABAMA,  
BALDWIN COUNTY.

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MORGAN A. LOVELL,

Plaintiff,

Vs.

W. NORRIS, also known as

WINIFRED NORRIS,

Defendant.  
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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW      NUMBER \_\_\_\_\_.

Before me, Mary Wattie Wilson, a

Notary Public in and for Jefferson County, State of Alabama, personally appeared Claude D. Harrell who, on oath, answers the writ of garnishment by Sheriff on attachment issued in this cause against The Travelers Insurance Company, a Corporation, and served on the Superintendent of Insurance of Alabama as Attorney for the service of process for said Corporation, and on oath says that he is an Adjuster for said Corporation and is duly authorized to make answer on behalf of said Corporation to the garnishment served on its said Attorney - said writ of garnishment requiring said Corporation to make answer on oath as to whether it is indebted to the defendant in this cause at the time of making answer, whether or not it will be indebted in the future to said defendant by a contract now existing, and whether it has in its possession or under its control personal or real property or things in action belonging to the said defendant; the said The Travelers Insurance Company advises the Court that at the time of making this answer it has not definitely determined that it is indebted to said defendant in this cause, in any amount,-- any indebtedness moving from the said Insurance Company to the said defendant being based on a collision loss on July 13, 1943, and on a policy of insurance issued by said Corporation insuring Winifred and A. F. Norris for actual cash value collision coverage only on a 1939 Ford Tudor Deluxe, motor 4942504; that at the time of making this answer the investigation surrounding this loss has not been completed and it



GARNISHEE'S SUPPLEMENTAL ANSWER

STATE OF ALABAMA.

BALDWIN COUNTY.

MORGAN A. LOVELL,

Plaintiff

Vs.

W. NORRIS, also known as

WINIFRED NORRIS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

NUMBER

Before me, Mary Hattie Wilson, a Notary

Public in and for Jefferson County, State of Alabama, personally

Aaron Vines

appeared ~~Charles D. Johnson~~ who, on oath, makes the following supple-

mental answer to the writ of garnishment by Sherriff on attachment

issued in this cause against The Travelers Insurance Company, and

says that the indebtedness of The Travelers Insurance Company to

Winifred Norris and A. F. Norris has now been determined to be in

the amount of \$540.00 growing out of the collision of the Ford auto-

mobile mentioned in the Garnishee's Answer heretofore filed in this

cause. The garnishee further suggests to this Honorable Court that

Commercial Financing, Inc., of LaGrange, Georgia, of which George S.

Johnson is President, is a claimant to \$305.36 of said indebtedness

by garnishee, by virtue of a mortgage on said automobile.

Garnishee tenders with this answer the sum of \$540.00

and offers to pay same into court, respectfully suggesting that

notice be given to said Commercial Financing, Inc., as a claimant to

said fund, and requests that garnishee be discharged from all further

liability in the premises, and that it be awarded its costs in this cause

incurred.

Affiant avers this answer is made by him for The Travelers

Insurance Company as the duly authorized agent of said Corporation to

make such answer, and that he has knowledge of the facts hereinabove stated.

Assistant

Aaron Vines  
Adjuster for The Travelers Insurance Company  
Garnishee

Subscribed and sworn to before me this  
the 8 day of December, 1943.

Mary Hattie Wilson  
Notary Public, Jefferson County, Alabama

McCurry M. Lee & James O. Rogers  
Attorneys for Garnishee.

WRIT OF ATTACHMENT.

STATE OF ALABAMA, X  
BALDWIN COUNTY. X

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Morgan A. Lovell has complained on oath to me, R. S. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that W. Norris is justly indebted to the said Morgan A. Lovell in the sum of Two Thousand Dollars (\$2000.00) and having made affidavit as required by law in such cases, you are hereby required to attach so much of the estate of W. Norris as will be of value to satisfy the said debt and costs; and such estate, unless replevied, so to secure that the same may be liable to further proceedings therein to be had in the Circuit Court, Baldwin County, Alabama, Law Side, to be held at the courthouse thereof; when and where you must make known how you have executed this writ.

WITNESS my hand on this the 22<sup>nd</sup> day of July, 1943.

R. S. Duck  
Clerk of the Circuit Court.

822

RECORDED  
WRIT OF ATTACHMENT

MORGAN A. LOVELL,

Plaintiff,

VS.

W. NORRIS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

BY *W. R. Stuart* Sheriff

W. R. Stuart, Sheriff Baldwin Co.

Executed this 22nd day of July 1943 by attaching  
One (1) 1939 Ford Coach, 1943 Florida Tag No. 23D6494

822

WRIT OF ATTACHMENT.

STATE OF ALABAMA, X  
BALDWIN COUNTY. 10001

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Morgan A. Lovell has complained on oath to me, R. S. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that W. Morris is justly indebted to the said Morgan A. Lovell in the sum of Two Thousand Dollars (\$2000.00) and having made affidavit as required by law in such cases, you are hereby required to attach so much of the estate of W. Morris as will be of value to satisfy the said debt and costs; and such estate, unless replevied, so to secure that the same may be liable to further proceedings therein to be had in the Circuit Court, Baldwin County, Alabama, Law Side, to be held at the courthouse thereof; when and where you must make known how you have executed this writ.

WITNESS my hand on this the 22<sup>nd</sup> day of **RECORDED** May, 1943.

CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA  
R. S. Duck  
M. MORRIS  
MORGAN A. LOVELL  
MILLER OF ALABAMA  
COB2



AFFIDAVIT

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority within and for said County in said State, personally appeared Morgan A. Lovell, who, after being by me first duly and legally sworn, deposes and says: That W. Norris is justly indebted to him, the said Morgan A. Lovell, in the sum of Two Thousand Dollars (\$2,000.00); that the said W. Norris is a non-resident of the State of Alabama and that this attachment is not sued out for the purpose of vexing or harassing the said W. Norris, Defendant.

Morgan A. Lovell

Sworn to and subscribed before me  
on this the 19th day of July, 1943.

Ora S. Nelson

Notary Public, Baldwin County, Ala.

*(Faint handwritten notes)*

*(Faint handwritten notes)*