1189

ALICE J. DUCK

Register And Clerk Of The Circuit Court

BALDWIN COUNTY

BAY MINETTE, ALA.

May 18, 1948

Hon. F. A. Christian,
Foley, Ala.,

Dear Mr. Christian:

Re: Standard Supply Co.
Hardware Co., a corp.
A Louisiana Corporation.
vs.
Watson Water Well Co.
Earl Watson, owner,

The above styled cause is an out of state Corporation, therefore requires security for cost before it can be placed on the docket.

Very truly yours,

Alice J. Duck
Clerk

Foley, Alabama
May 19, 1948

Dear Mrs. Duck:

There has been deposited with me by each company, a sufficient amount to take care of the court costs in these cases and I will be personally responsible for their payments in the event that the defendant does not pay them.

Yours very truly,

F. A. Christian

If this is not satisfactory, please let me know

SUMMONS & COMPLAINT

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summon the WATSON WATER WELL COMPANY, Earl L. Watson, owner, 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 same, then and there to answer the Complaint of STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana Corporation.

Witness my hand this the 17th day of May, 1948.

Vice L. Welch
Clerk

. . . . . .

STANDARD SUPPLY AND HARDWARE CO., INC., A Louisiana Corporation, Plaintiff vs. WATSON WATER WELL COMPANY, Earl L. Watson, Owner, Defendant	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN LAW

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00), together with interest thereon, due from him by account on, to wit: the 15th day of May, 1948, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00), together with interest thereon, due from him on account state between the Plaintiff and the Defendant on, to wit: the 15th day of May, 1948, which sum of money together with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 15th day of May, 1948, which sum of money with the interest thereon, is still unpaid.

Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of the amount of this claim, verified by the affidavit of a competent witness, made before and certified to by a Notary Public, which shows the amount owed on this claim.

Defendant lives at Foley
c/o J P Boswell & Son

THE STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, within and for the Parish and State aforesaid, on this day personally appeared CAL F. HADDEN known to me who, being by me duly sworn, states on oath that the foregoing and annexed account in favor of STANDARD SUPPLY AND HARDWARE CO. INC.

*which is a corporation organized and existing under the laws of the State of LOUISIANA and of which corporation affiant is the authorized TREASURER
Agent, Attorney, President or Secretary

(or) *which is a co-partnership consisting of _____ and of which co-partnership affiant is _____
Member, Agent or Attorney

And which account is against WATSON WATER WELL COMPANY for the sum of ONE HUNDRED EIGHTY EIGHT & 0/100- - - - - - - - - - - - - ($188.00) Dollars is within the knowledge of affiant, just and true; that it is due and unpaid, and that all just and lawful offsets, payments and credits have been allowed.

Cal F. Hadden

Sworn to and subscribed before me, the 13th day of November A. D., 19 47

W A Byrnes
Notary Public.

*ERASE ACCORDING TO FACTS

Received in Sheriff's Office
this 17 day of May, 1948
TAYLOR WILKINS, Sheriff

Executed 6-25-1948
by leaving copy
with Earl L. Watson

Taylor Wilkins Sheriff
By R. Willis D. S.

RECORDED 1189

SUMMONS AND COMPLAINT

STANDARD SUPPLY AND HARDWARE CO.,
INC.,
A Louisiana Corporation,

Plaintiff

vs.

WATSON WATER WELL COMPANY,
Earl L. Watson, Owner,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

Filed
5-17-48
Alice Duck
Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

STANDARD SUPPLY AND HARDWARE CO., INC. A Louisiana Corporation, Plaintiff	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
WATSON WATER WELL COMPANY, Earl L. Watson, Owner, Defendant	)	IN LAW

Comes the Plaintiff by its attorney and moves the Court to render Judgment by Default in the amount of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00). There was attached and made a part of the original complaint an itemized statement of this claim verified by the affidavit of a competent witness, made before and certified to by a notary public.

Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

STANDARD SUPPLY AND HARDWARE CO.,
INC.,
A LOUISIANA CORPORATION,
Plaintiff

vs.

WATSON WATER WELL COMPANY,
Earl L. Watson, owner,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

Filed
2-29-48
Alice J. Duck, clerk

AFFIDAVIT ON JUDGMENT

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

Personally appeared before me, GUS SCHULTZ, a Notary Puboic in and for said County and State, FOREST A. CHRISTIAN, attorney of record for STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation, who, being duly sworn deposes and saith that the STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation, on the 3th day of July, 1948, did recover a judgment against WATSON WATER WELL COMPANY, Earl L. Watson, owner, in the sum of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00), plus TEN & 95/100 DOLLARS ($10.95) court costs, and that he believes that the process of garnishment is necessary to obtain satisfaction of said judgment, and that the DEEP WELL DRILLING CO., INC., a corporation organized and existing under the lawsoof the State of Alabama, has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or that it is or is believed to be indebted to the defendant, or is to be liable to him 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.

Forest A. Christian,
Attorney of record for Standard Supply and Hardware Co., Inc., a Louisiana Corporation.

Sworn to and subscribed before me this the 9th day of May, 1949.

Gus Schultz
Notary Public

My commission expires:
1-24-53

RECORDED

1189½

AFFIDAVIT ON JUDGMENT

STANDARD SUPPLY AND HARDWARE CO.,
a Louisiana Corporation

Plaintiff

vs.

WATSON WATER WELL COMPANY,
Earl L. Watson, Owner,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAY 10 1949

ALICE J. DUCK, Clerk

NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation Plaintiff vs. WATSON WATER WELL COMPANY, Earl L. Watson, Owner, Defendant DEEP WELL DRILLING CO., INC., Garnishee	THE STATE OF ALABAMA BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA GREETING:

You are hereby commanded to notify the WATSON WATER WELL COMPANY, Earl L. Watson, Owner, that on the_____day of May, 1949, a writ of garnishment in the above stated case was issued to the DEEP WELL DRILLING CO., INC., as garnishee.

And you will return this writ according to law.

Witness my hand this the 10th day of May, 1949.

Clerk

Received in office_____day of May, 1949.

Sheriff

Executed by serving a copy of the within writ on_____day of May, 1949.

Sheriff

Deputy

11 89½

Copy for Earl Watson

NOTICE TO DEFENDANT

STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation

Plaintiff

vs.

WATSON WATER WELL COMPANY, Earl L. Watson, Owner,

Defendant

DEEP WELL DRILLING CO., INC.,

Garnishee

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAY 10 1949

ALICE J. DUCK, Clerk

NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation Plaintiff vs. WATSON WATER WELL COMPANY, Earl L. Watson, Owner, Defendant DEEP WELL DRILLING CO., INC., Garnishee	THE STATE OF ALABAMA BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to notify the WATSON WATER WELL COMPANY, Earl L. Watson, Owner, that on the_____day of May, 1949, a writ of garnishment in the above stated case was issued to the DEEP WELL DRILLING CO., INC., as garnishee.

And you will return this writ according to law.

Witness my hand this the 10th day of May, 1949.

Dewey J. Neuck
Clerk

Received in office_____day of May, 1949.

_____
Sheriff

Executed by serving a copy of the within writ on_____day of May, 1949.

_____
Sheriff

_____
Deputy

original Earl Watson

1189½

Received in Sheriff's Office
this 10 day of May, 1949
TAYLOR WILKINS, Sheriff

Returned 2 day of June 19 49
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By Vince B. Gilbert
Deputy Sheriff

NOTICE TO DEFENDANT

STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation,

Plaintiff

vs.

WATSON WATER WELL COMPANY, Earl L. Watson, Owner,

Defendant

DEEP WELL DRILLING CO., INC.,

Garnishee

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAY 10 1949

ALICE J. DUCK, Clerk

WRIT ON JUDGMENT

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas FOREST A. CHRISTIAN has made affidavit as required by law that the STANDARD SUPPLY AND HARDWARE CO., INC., a Lousiana corporation, on the 31st day of July, 1948, the Circuit Court of Baldwin County recovered a judgment against the WATSON WATER WELL COMPANY, Earl L. Watson, owner, for the sum of ONE HUNDRED THIRTY EIGHT & 00/100 DOLLARS ($138.00) and the further sum of TEN & 95/100 DOLLARS ($10.95) cost of suit; and that he believes that the process of garnishment is necessary to obtain satisfaction of said judgment, and that the DEEP WELL DRILLING CO., INC., a corporation organized and existing under the laws of the State of Alabama, has, or is believed to have in its possession or under its control money or effects belonging to the defendant, or that it is or is believed to be indebted to the defendant, or to be liable to him 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.

These are therefore to command you, that you summon the said DEEP WELL DRILLING CO., INC., to be and appear at the next Term of Circuit Court of BaldwinCounty to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession, or under its control any money or effects belonging to the defendant; and whether it is indebted to said defendant, or is liable to him on any contract for the payment of money or 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.

Witness, Alice J. Duck, Clerk of said Court at office, this the 20th day of May, A. D., 1949.

Alice J. Duck
Clerk

Mr. W. M. Boswell, President of
Deep Well Drilling Co., Inc. lives
at Foley, Alabama

original W. M. Boswell

1189½

Received in Sheriff's Office
this 10 day of May 1949
TAYLOR WILKINS, Sheriff

Executed 5-10 1949
by serving a copy of within Summons and Complaint on

W. M. Boswell

Taylor Wilkins Sheriff
By Collingh Steadham Deputy Sheriff

RECORDED

WRIT ON JUDGMENT

STANDARD SUPPLY AND HARDWARE CO., INC., a Louisiana corporation

Plaintiff

vs.

WATSON WATER WELL COMPANY, Earl L. Watson, Owner,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED
MAY 10 1949
ALICE L. DUCK, Clerk

5-10

STANDARD SUPPLY AND HARDWARE COMPANY, INC., Plaintiff,	
vs.	
WATSON WATER WELL COMPANY, EARL L. WATSON, Owner Defendant	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
DEEP WELL DRILLING COMPANY, INC., Garnishee	

Personally appeared before me, Cecil G. Chason, a Notary Public in and for said County in said State, W. M. Boswell, who is personally known to me, who being by me duly sworn, on oath says, that he as President of Deep Well Drilling Company, Inc., a corporation, has personal knowledge of the facts herein stated, and is authorized to sign this answer to said garnishment, and for answer to same says: that the garnishee is not now indebted to the defendant in any sum whatever, and was not indebted to him at the time of the service of this garnishment, nor at any time intervening between the time of the service of the garnishment and the making of this answer, and that it will not be indebted in the future to the said defendant by any contract then or now existing, and that it will not be liable to the defendant for the delivery of personal property by any contract then or now existing, for the delivery of personal property, nor for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and that it has not in its possession or under its control money or effects belonging to the defendant.

W. M. Boswell
W. M. Boswell, President
Deep Well Drilling Company, Inc.
a Corporation.

Sworn to and subscribed before me
this 25 day of May 1949.

Cecil G. Chason
Notary Public, Baldwin Co.,
State of Alabama

C. G. C.

1189½