

WM. I	F. :	SURGI	EQUIPMEN	T 30. Plaintiff)	I	N I	HE	O TROUI	T	COURT (Œ
			vs:)	Ī	التفا	D'A IV	COUNT	Υ,	AIA BAT	
EARL	I.	WATS	ON,	Defendant)				IN LAW			

Comes the Plaintiff by its attorney and moves the Court to render Judgment by Default in the amount of TWO HUNDRED SIXTY SIX & 35/100 DOLLARS (\$266.33). 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

VM. F. SURGI EQUIPMENT CO. Plaintiff

γs.

EARL L. WATSON,
Defendant

IN THE CIRCUIT COURT OF

BALLWEN COUNTY, ALABAMA

IN LAA

Filed 129-48 leich Duck

SUMMONS

THE STATE OF ALABAMA,

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon EARL L. WATSON, 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 WM. F. SURGI EQUIPMENT CO.

Witness my hand this the // day of May, 1948.

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COMPLAINT

WM. F. SURGI EQUIPMENT CO.

Plaintiff

IN THE CIRCUIT COURT OF

⊽s.

BALDWIN COUNTY, ALABAMA

EARL L. WATSON,

Defendant

IN LAW

COUNT I

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY SIX & 33/100 DOLLARS (\$266.33), 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 TWO HUNDRED SIXTY SIX & 33/100 DOLLARS (\$266.33), 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 TWO HUNDRED SIXTY SIX & 33/100 DOLLARS (\$266.33), 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,

July H. Muller

Defendant luce at Faley, who Go J.D. BOSNEWH + 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 Charles & Treen
known to me who, being by me duly sworn, states on oath that the foregoing and annexed account in WM. F. SURGI ECTIPMENT CO.
*which is a corporation organized and existing under the laws of the State of
and of which corporation affiant is the authorized
and of which co-partnership affiant is
And which account is against Sarl & Watson
for the sum of Three hundred sifteen + 3/00 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.
Sworn to and subscribed befr 6th day of November A.D., 1947
•ERASE ACCORDING TO FACTS Notary Public.

Beceived in Sheriff's Office this / /day of May, 194 8 TAYLOR WILKINS, Sheriff

Execution (-25: 48)

" By leaving Copy

" With East S. Watern

Jaylor Wilking Shirty

WR Willie D. J.



SUMMONS AND COMPLAINE

VM. F. SURGI EQUIPMENT CO.

Plaintiff

VS.

EARL L. WATSON, Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

Filed 3--17-48 Ducker

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDW.	IN COUNTY, ALABAMA.
WM. F. SURGI EQUIPMENT CO.,	
Plaintiff	
¥3•	THE STATE OF ALABAMA
EARL L. WATSON,	BALDWIN COUNTY.
Defendant	
DEEP WELL DRILLING CO., INC.,	
Garni sh 🕫	
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//////// day o	f May, 1949.
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The second secon	Sheriff
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	Deputy

Taylor Wilking, Sheriff

NOTICE TO DEFENDANT

WM. F. SURGI EQUIPMENT CO.,

Pla int iff

EARL L. WATSON.

Defendant

DEEP WELL DRILLING CO., INC.

Garnishee

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAM

AT LAW

MAY 10 1949 ALICE J. DUCK, Clerk

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NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

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Coppy for Earl 1. Watson

NOTICE TO DEFENDANT

WM. F. SURGI EQUIPMENT CO..

Plaintiff

WATSON, FARL L.

Defendant

DEEP WELL DRILLING 00., INC.

Garnishee

IN THE CLROUIT COURT OF BALDWIN COUNTY, AIABAMA AT LAW

FILED

MAY 10 1949

ALICE J. DUCK, Clerk

THE SHARE THE SECOND AS A SECO

W. F. SURGI EQUIPMENT COMPANY

Plaintiff,

vs.

EARL L. WATSON

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

Defendant.

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 possess ion or under its control money or effects belonging to the defendant.

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

Sworn to and subscribed before me this 252 day of _______, 1949.

Notary Public, Baldwin Co. State of Alabama.

11901n

MAY 30 1949
ALICE J. DUCK, Clerk

WRIT ON JUDGMENT

THE STATE OF ALABAMA,

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA C GREETING:

Whereas FOREST A. CHRISTIAN has made affidavit as required by law that WM. F. SURGI EQUIPMENT CO. on the 3th day of 1948, the Circuit Court of Baldwin County recovered a judgment against FARL L. WATSON for the sum of TWO HUNDRED SIXTY SIX & 33/100 DOLLARS (\$266.33), and the further sum of TWN & 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 WHIL 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 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 Baldwin County to be holden for said county, within thirty days after the service of this writ of garmishment, then and there to answer on eath, 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 10 Court day of May, A. D., 1949.

Clerk

Mr. W. M. Boswell, President of Deep Well Drilling Co., Inc. lives at Foley, Alabama 1190/2

Driginal

Received in Shariff's Office this 10 day of May, 194 9 TAYLOR WILKERS, Sheriff

Executed 5-10 19 49
by serving copy of within Summons and
Complaint on

W.M. Bornell

Taylor Milpins Shorist

CORDER

WRIT ON JUDGMENT

WM. F. SURGI EQUIPMENT CO.

Plaintiff

vs.

EARL L. WATSON.

Defendant

BALDVIN COUNTY?, ALABAMA

FILED
MAY 10 1949
ALICE J. DUCK, Clerk

5-10

AFFIDAVIT ON JUDGMENT

THE STATE OF ALABAMA,
BALDMIN COUNTY.

Personally appeared before me, GUS SCHULTZ, a Notary Public in and for said County and State, FOREST A. CHRISTIAN, attorney of record for WM. F. SURGI EQUIPMENT CO., who, being duly sporn, deposes and saith that WM. F. SURGI EQUIPMENT CO. on the th day of the the sum of TWO HUNDRED SIXTY SIX & 33/100 DOLLARS (\$266.33), plus TEM & 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 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 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.

Forest A. hristian,
Attorney of Record for Wm. F. Surgi
Equipment Co.

Sworm to and subscribed before me this the

__day of May, 1949.

My-commission expires:

1-24-53

Notary Public

PECORDED

AFFIDAVIT ON JUDGMENT

VM. F. SURGI EQUIPMENT CO.

Plantiff

HARL L. WATSON,

Defendan t

IN THE CIRCUIT COURT OF BALDWIN COUNTY, AIABAMA AT LAW