

1304

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon EARL 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 HELEN BROWN, doing business as H. BROWN'S GARAGE & IRON WORKS, (Eunice, Louisiana).

Witness my hand this the 12 day of February, 1949.

W. J. Duck
Clerk

.....

COMPLAINT

HELEN BROWN, doing business as H. BROWN'S GARAGE & IRON WORKS, (Eunice, Louisiana),)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
EARL WATSON,)	
Defendant)	

COUNT I

The Plaintiff claims of the Defendant the sum of FOUR THOUSAND TWO HUNDRED THIRTY ONE & 00/100 DOLLARS (\$4,231.00), together with interest thereon, due from him by account on, to wit: the 29th day of November, 1947, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of FOUR THOUSAND TWO HUNDRED THIRTY ONE & 00/100 DOLLARS (\$4,231.00), together with interest thereon, due from him on account state between the Plaintiff and the Defendant on, to wit: the 29th day of November, 1947, which sum of money, together with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of FOUR THOUSAND TWO HUNDRED THIRTY ONE & 00/100 DOLLARS (\$4,231.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 29th day of November, 1947, which sum of money, with interest thereon, is still unpaid.

Forest A. Christian
Forest A. Christian,
Attorney for Plaintiff

There is attached hereto and made a part hereof the affidavit of a competent witness, made before and certified to by a Notary Public, which shows the amount owed on this claim as of February 4, 1949.

Earl Watson
The Defendant lives at Foley, Alabama

I, Forest A. Christian, will be personally responsible for the court costs in this case.

Forest A. Christian

DAY PHONE DIAL 2224
NIGHT PHONE 2317

STATEMENT
~~INVOICE~~

P. O. Box 242

PORTABLE WELDING MACHINES
AUTO AND TRUCK REPAIRING
FARM MACHINERY REPAIRING

H. BROWN'S GARAGE & IRON WORKS

HELEN BROWN, OWNER
EUNICE, LOUISIANA

INVOICE NO. _____
IRRIGATION WATER WELL DRILLING
IRRIGATION PUMP REPAIRING
COMPLETE MACHINE SHOP

DATE February 4 1949

TO

Mr. Earl Watson
Foley, Alabama

1946, Oct. 15,	To Labor & Material to Erect Two Drilling Rig -	\$5,857.74
	Paid by Cash	1,637.00
	Balance Due On Rigs	<u>\$4,220.74</u>
1947, May, 14,	Inv. # 02936	3.63
1947, Nov. 29,	" # 02977	6.63
		<u>\$4,231.00</u>

STATE OF LOUISIANA
PARISH OF ST. LANDRY

BEFORE ME, the undersigned authority, on this day personally came and appeared HELEN BROWN, who, after being duly sworn, did depose and say:

That he is the owner and operator of H. Brown's Garage & Iron Works and that the above and foregoing is a true, correct and accurate account of the indebtedness of Earl Watson in favor of H. Brown's Garage & Iron Works.

Helen Brown

SWORN TO AND SUBSCRIBED, before me, on this 4 February, 1949.

James Kessler
Notary Public

ORIGINAL

Notarized in the presence of
this 12 day of Feb, 1949
TAYLOR WILLARD, Clerk

Executed this the
12th day of Feb, 1949
by serving a copy
of the within
Summons and
Complaint on
Earl Watson

G. I. Tucker
Sherry Bullock Co.

Union Springs Ala.
no 1304

SUMMONS AND COMPLAINT

HELEN BROWN, doing business as
H. BROWN'S GARAGE & IRON WORKS,
(Eunice, Louisiana),

Plaintiff

vs.

EARL WATSON,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
FILED
FEB 12 1949
MACE J. BUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

HELEN BROWN, doing business
as H. BROWN'S GARAGE & IRON
WORKS, (Eunice, Louisiana),

Plaintiff

vs.

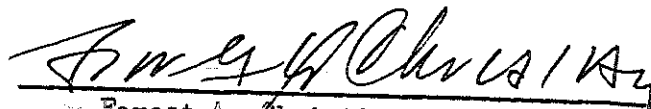
EARL WATSON,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes the Plaintiff, by its attorney, and moves the Court to render Judgment by Default in the amount of FOUR THOUSAND TWO HUNDRED THIRTY ONE & 00/100 DOLLARS (\$4,231.00) principal, plus accrued interest to date of THREE HUNDRED SEVENTEEN & 00/100 DOLLARS (\$317.00), for a total of FOUR THOUSAND FIVE HUNDRED FORTY EIGHT & 00/100 DOLLARS (\$4,548.00) against the Defendant.

There was attached to the original complaint an affidavit of a competent witness sworn to before a notary public.



Forest A. Christian,
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

HELEN BROWN, doing business as
H. BROWN'S GARAGE & IRON WORKS,
(Munice, Louisiana),

Plaintiff

vs.

EARL WATSON,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAR 30 1949

ALICE A. DUCK, Clerk

MOTION FOR JUDGMENT BY DEFAULT

HELEN BROWN, doing business
as H. BROWN'S GARAGE & IRON
WORKS, (Eunice, Louisiana),

Plaintiff

vs.

EARL WATSON,

Defendant

IN THE CIRCUIT COURT OF

BAWDEN COUNTY, ALABAMA

AT LAW

Comes the Plaintiff, by its attorney, and moves the Court to render Judgment by Default in the amount of FOUR THOUSAND TWO HUNDRED THIRTY ONE & 00/100 DOLLARS (\$4,231.00) principal, plus accrued interest to date of THREE HUNDRED SEVENTEEN & 00/100 DOLLARS (\$317.00), for a total of FOUR THOUSAND FIVE HUNDRED FORTY EIGHT & 00/100 DOLLARS (\$4,548.00) against the Defendant.

There was attached to the original complaint an affidavit of a competent witness sworn to before a notary public.

Forest A. Christian

Forest A. Christian,
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

HELEN BROWN, doing business as
H. BROWN'S GARAGE & IRON WORKS,
(Eunice, Louisiana),

Plaintiff

vs.

EARL WATSON,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAR 30 1949

ALICE A. DUCK, Clerk

WRIT ON JUDGMENT

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas HELEN BROWN has made affidavit as required by law that HELEN BROWN, doing business as BROWN'S GARAGE & IRON WORKS, on the 31st day of March, 1949, the Circuit Court of Baldwin County recovered a judgment against EARL WATSON for the sum of FOUR THOUSAND FIVE HUNDRED FORTY EIGHT & 00/100 DOLLARS (\$4,548), and the further sum of ELEVEN & 45/100 DOLLARS (\$11.45) cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that the DEEP WELL DRILLING CO., INC., a corporation organized 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 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 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 10th 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

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

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

W. M. Boswell

Taylor Welbourn Sheriff
By Edlergh Steadman County Sheriff

RECORDED

1304½

original W. M. Bowdell

WRIT ON JUDGMENT

HELEN BROWN, doing business as
BROWN'S GARAGE & IRON WORKS,
(a Louisiana Corporation)

Plaintiff

vs.

EARL WATSON

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
MAY 10 1949

MAY 10 1964
ALICE J. DUCK, Registrar

6-10

[illegible][illegible][illegible][illegible]

HELEN BROWN, doing business as
BROWNS GARAGE AND IRON WORKS

Plaintiff,

vs.

EARL WATSON

Defendant.

DEEP WELL DRILLING COMPANY, INC.)

Garnishee


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

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, President
Deep Well Drilling Company, Inc.,
a corporation.

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


Notary Public, Baldwin Co.
State of Alabama

1304 1/2

FILED
MAY 30 1949
ALICE J. DUCK, Clerk

AFFIDAVIT ON JUDGMENT

THE STATE OF LOUISIANA,)
)
PARISH OF ST. LANDRY)

Personally appeared before me, FRANCES KESSLER, a Notary Public in and for said Parish and State, HELEN BROWN, doing business as BROWN'S GARAGE & IRON WORKS, who, being duly sworn, deposes and saith that HELEN BROWN on the 31st day of March, 1949, did recover a judgment against EARL WATSON in the sum of FOUR THOUSAND FIVE HUNDRED FORTY EIGHT & 00/100 DOLLARS (\$4,548), plus ELEVEN & 45/100 DOLLARS (\$11.45) court costs, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that the DEEP WELL DRILLING CO., INC., a corporation organized 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, or which is payable in personal property.

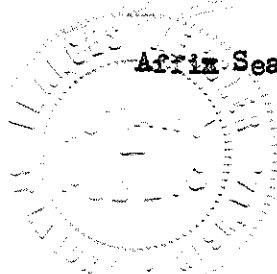
Helen Brown
Helen Brown,
Doing Business As Brown's Garage &
Iron Works

Sorn to and subscribed before me this the 3rd day of May, 1949.

My commission expires:
September 18, 1952

Frances Kessler
Notary Public

Affix Seal:



1304 1/2 RECORDED

AFFIDAVIT ON JUDGMENT

HELEN BROWN, doing business as
BROWN'S GARAGE & IRON WORKS
(a Louisiana Corporation)

P l a i n t i f f

VS.

EARL WATSON

FILED

MAY 10 1949

ALICE J. DICK, ~~RECEIVED~~ *clerk*

[The page contains extremely faint, illegible markings.]

[illegible]

Figure 1. Schematic diagram of the experimental setup.

NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

HELEN BROWN, doing business
as H. BROWN'S GARAGE & IRON
WORKS, (Emmice, Louisiana),

Plaintiff

vs:

EARL WATSON,

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 EARL WATSON that on the _____ day
of _____, 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 10th day of May, 1949.

Archie J. Duck
Clerk

Received in office _____ day of _____, 1949.

Sheriff

Executed by serving a copy of the within writ on _____ day of _____,
1949.

Sheriff

Deputy

this day
 TAYLOR

Received in Sheriff's Office
this 10 day of May 1949
J. H. [Signature] Sheriff

Returned 2 day of June 1949
Not found in my study after diligent search and in-
quiry.

By James B. Griffin Deputy Sheriff

NOTICE TO DEFENDANT

HELEN BROWN, doing business as
BROWN'S GARAGE & IRON WORKS
(Bunice, Louisiana)

Plaintiff

vs.

EARL WATSON,

Defendant

BHEP WELL DRILLING CO., INC.

Garnishes

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
MAY 10 1949

ALICE J. DUCK, Register

[illegible][illegible]

Journal of Management Studies, 19(6), 701-718.

1. The first part of the document is a list of references. The references are as follows:

- 1. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 2. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 3. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 4. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 5. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 6. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 7. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 8. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 9. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).
- 10. J. H. D. Elmslie, *Proc. R. Soc. London, Ser. A*, **193**, 1 (1947).

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NOTICE TO DEFENDANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

HELEN BROWN, doing business
as H. BROWN'S GARAGE & IRON
WORKS, (Eunice, Louisiana),

Plaintiff

vs:

EARL WATSON,

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 EARL WATSON that on the _____ day
of _____, 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 10th day of May, 1949.

Clerk

Received in office _____ day of _____, 1949.

Sheriff

Executed by serving a copy of the within writ on _____ day of _____,
1949.

Sheriff

Deputy

1304 1/2
Copy for Earl Watson

NOTICE TO DEFENDANT

HELEN BROWN, doing business as
BROWN'S GARAGE & IRON WORKS,
(Eunice, Louisiana)

Plaintiff

vs.

EARL WATSON,

Defendant

DEEP WELL DRILLING CO., INC.,

Garnishee

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
MAY 10 1949
ALICE J. DUCK, Register

1304 1/2