

C. H. WILSON, an individual
d/b/a "The Home Furniture Co."
Plaintiff

VS.

GEORGE MOSS,
Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY,

ALABAMA.

AT LAW. NO. 1342

COUNT ONE.

Plaintiff claims of the defendant the sum of \$295.00, due by conditional sales contracts made and payable by them as follows, to-wit: contract in the amount of \$14.95, dated 9-5-47, and payable \$10.00 cash, and \$2.00 per week; contract in the amount of \$13.95, dated 9-27-47, and payable \$2.00 cash and \$1.25 per week; contract in the amount of \$12.95, dated 11-29-47, and payable on demand; contract in the amount of \$287.00, dated 12-1-47, and payable \$10.00 weekly; contract in the amount of \$17.95, dated 12-20-47, payable \$3.00 cash and \$1.25 weekly, which sum of money with interest thereon is still due and unpaid.

Plaintiff claims a reasonable attorney's fee, averring that the sum of \$75.00 is a reasonable fee, which said fee defendant agreed in each of said above contracts to pay. Said contracts contain waivers of exemptions.

COUNT TWO.

Plaintiff claims of the defendant the sum of \$295.00 due from him by account on to-wit: December 20, 1947, which sum of money with interest thereon is still due and unpaid.

COUNT THREE.

Plaintiff claims of the defendant the sum of \$295.00 due from him by account stated on to-wit: December 20, 1947.

Alvin T. Agee
ALVIN T. AGEE

Attorney for Plaintiff

DEFENDANT'S ADDRESS:

Works for E. F. Stuart, Contractor,
Bay Minette, Alabama

FILED
MAY 2 1949
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA }
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

No.-----

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon

George Moss

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

George Moss

_____, Defendant....

by

C. M. Wilson d/b/a Home Furniture Co

_____, Plaintiff....

Witness my hand this

2nd

day of

May

194*9*

Lucas J. Wilson

_____, Clerk

No. 1342

Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

C. N. Wilson

d/b/a The Home Furniture Co
Plaintiffs

vs.

George Moss

Defendants

SUMMONS and COMPLAINT

Filed 5-2, 1949

Alice J. Leach Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Works for E. J. Stuart

RECEIVED IN OFFICE

5-3

, 1949

Taylor Wilkins

Sheriff

I have executed this summons

this 4th May, 1949
by leaving a copy with

George Moss

Taylor Wilkins

Sheriff

A. M. Zindale

Deputy Sheriff

THE STATE OF ALABAMA, {
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, At a regular September Term, 194 9 of the Circuit Court of Baldwin County,
to-wit: On the 13th day of September, 194 9, being a regular day of
said term, C. N. Wilson, d/b/a The Home Furniture Co.

recovered judgment against George Moss

for the sum of Three hundred, forty-five and No/100 Dollars, and cost of suit,

and affidavit having been made by Allwyn T. Agee
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

J. F. Kelly, 2317 St. Stephens Road, Mobile, Alabama

has or is believed to have in his possession, or under his control money
or effects belonging to said defendant George Moss or that he is, or

is believed to be indebted to said defendant George Moss or to be liable to them, or to one of them 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.

You Are Therefore Hereby Commanded to Summon

J. F. Kelly, 2317 St. Stephens Road, Mobile, Alabama

to be and appear before the honorable the Circuit Court for Baldwin County, at the Court House thereof, in
the city of Bay Minette, on the within 30 days Monday in January A. D. 194 50,

then and there within the three first days of the term, to answer on oath, whether at the time of the service
of the garnishment, or at the time making his answer, or at any time intervening the time of serv-
ing the garnishment and making the answer he was not indebted to said defendant

George Moss and whether J. F. Kelly will not be indebted in future to said defendant
George Moss by a contract then existing, and whether by a contract then existing J. F. Kelly
is, or are, liable to said defendants 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 J. F. Kelly has not in his possession or under his control money or
effects belonging to the defendant George Moss

Herein fail not, and have you then and there this Writ.

Witness, Alice J. Duck, Clerk of said Court, this 11th day of January

A. D., 194 50 ISSUED 11th day of January A. D. 194 50

ATTEST:

Alice J. Duck Clerk.

644
Q
RECORDED

Circuit Court, Baldwin County

No. 1342 1/2

Received in Sheriff's Office
this 14 day of Jan., 1950
TAYLOR WILKINS, Sheriff

C. N. WILSON, d/b/a The Home Furniture Co.

VS. } GARNISHMENT ON JUDGMENT

GEORGE MOSS

Received 15 Day of January 19 50
and on 19 Day of January 19 50
I served a copy of the writ on
on
by service on J. Kelly
W. H. HOLCOMBE, Sheriff
By Mary Sanders, D.S.

Issued 14th day of January 19450

Returnable day of 194

19 2 T. Kelly

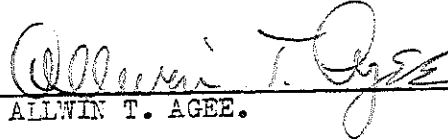
Allwin T. Agee

Attorney.

STATE OF ALABAMA:

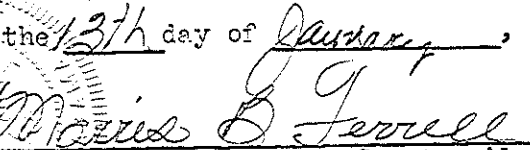
COUNTY OF MOBILE:

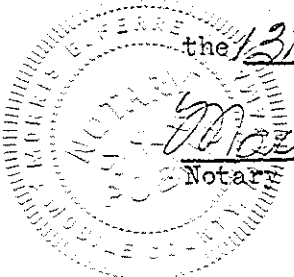
Before me, the undersigned authority, personally appeared
ALLWIN T. AGEE, attorney, who made oath in due form of law that
C. N. WILSON doing business as "The Home Furniture Co", of Prichard,
Alabama, hath obtained judgment against GEORGE MOSS, for \$345.00, besides cost of
suit before the Circuit Court, Civil Division, Baldwin County, Alabama,
and that J. F. Kelley, 2317 St. Stephens Road, Mobile, Alabama, a contractor,
is supposed to be indebted to or have effects of the said George Moss in
his possession, or under his control, and that he believes process of
Garnishment is necessary against the said J. F. Kelley, to obtain satisfaction
of his judgment.


ALLWIN T. AGEE.

Subscribed and sworn to before me,

the 13th day of January, 1950.


Notary Public, Mobile County, Alabama.



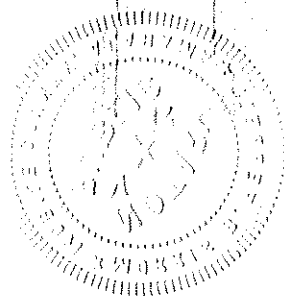
1342 1/2

RECORDED

FILED

JAN 14 1950

ALICE L. BROWN, Clerk



STATE OF ALABAMA,
BALDWIN COUNTY }

TO George Moss, Defendant

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of

C. N. WILSON d/b/a THE HOME FURNITURE CO., Plaintiff

versus GEORGE MOSS, Defendant

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

J. F. Kelly, 2317 St. Stephens Road, Mobile, Alabama

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 11th

day of January, 1950.

W. J. Smith

Clerk of the Circuit Court.

P 1342
644
RECORDED
NOTICE
TO DEFENDANT OF GARNISHMENT

BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO
(George Moss)

~~GEORGE MOSS~~
C. N. WILSON, d/b/a The Home E

Plaintiff

VS.

George Moss

Defendant.....

Received 15 Day of January 1950
and on 19 Day of January 50
I served a copy of the writ

on
by service on George Moss

W. H. HOLCOMBE, Sheriff
By Harry Standley

ALLWIN T. AGEE

ATTORNEY-AT-LAW

76 NORTH WILSON AVENUE

PRICHARD, ALABAMA

January 12, 1950

Circuit Clerk
Civil Division, Circuit Court
County Court House
Bay Minette, Alabama

Re: C. N. Wilson d/b/a "Home Furniture Co."

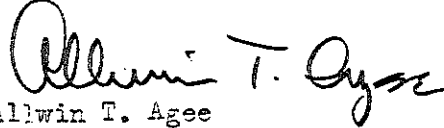
vs

George Moss.

Dear Madam,

Enclosed please find garnishment affidavit in the above styled cause,
naming one J. F. Kelley, 2317 St. Stephens Road, Mobile, Alabama, as
garnishee. Request is made that said garnishment be issued.

Very sincerely yours,


Allwin T. Agee

ATA/ca

1342½

C. N. Wilson

d/o/s The Home Furniture Co

vs.

George Moss

Examiners

1-14-50

Allwin J. Agee

C. N. WILSON, d/b/a
The Home Furniture
Company

PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 1342½


VS.

GEORGE MOSS

DEFENDANT


And now on this the 7th day of February, 1950, comes J. F. Kelly, who being duly sworn, deposes and says: For answer to the garnishment heretofore served in this cause, that at the time of the service of said writ of garnishment and at the time of making this answer, he was not indebted to said George Moss, and that he will not be indebted in future to said George Moss by contract then or now existing; that he will not be liable to said George Moss 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 he has not in his possession or under his control money or effects belonging to said George Moss.

Having fully answered said garnishment the said garnishee prays to be dismissed with a reasonable cost for making this answer.

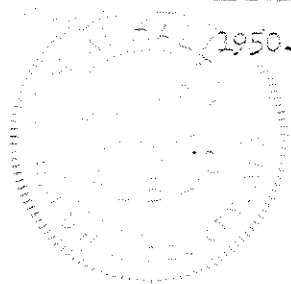


Sworn to and subscribed before me on this the 7th day of February,

1950.



Notary Public, Baldwin County, Alabama



RECORDED

C. N. WILSON, d/b/a
The Home Furniture
Company

PLAINTIFF

VS.

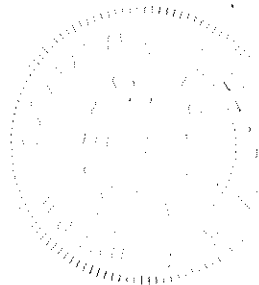
GEORGE MOSS

DEFENDANT

FILED

FEB 7 1950

ALICE A. DUCK, CLERK



15
File