

DENYING INDEBTEDNESS

THE STATE OF ALABAMA

BALDWIN COUNTY

MAY SUPPLY COMPANY and
SEARS ROEBUCK & COMPANY,
Plaintiffs

vs

H. Y. MILLER,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

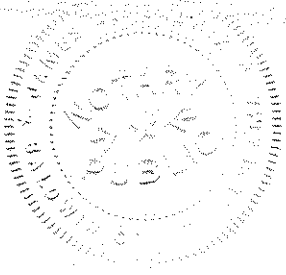
AT LAW

Personally appeared before me, James A. Hendrix, a Notary Public in and for said State and County, Alex Lennicx, who is personally known to me, who being by me duly sworn, on oath says, that he is the garnishee in the above-stated case, and answering the garnishment therein he 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 he will not be indebted in the future to the said defendant by any contract then or now existing, and that he 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, not for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and that he has not in his possession or under his control money or effects belonging to the defendant.

Alex Lennicx

Sworn to and subscribed before me this 30 day of January, 1954.

James A. Hendrix
Notary Public, Baldwin County, Alabama



7814 1/2

FILE 10

FEB 2 1954

1. The first group of people who are interested in the study of the history of the United States are the people who are interested in the history of the United States.

AFFIDAVIT ON JUDGMENT

THE STATE OF ALABAMA,

BALDWIN COUNTY.

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County Forest A. Christian, who being duly sworn, deposes and saith that May Supply Co. on the 5th day of August, 1952 in the Circuit Court of Baldwin County recovered an judgment against H. Y. Miller d/b/a Miller Plumbing Co. for the sum of \$268.81 and a further sum of \$10.55; and that Sears Roebuck & Co. on the 25th day of November, 1953 in the Justice of the Peace Court of M. R. Howell, precinct No. 14 recovered a judgment against H. Y. Miller for the sum of \$68.28 and a further sum of \$4.35, court cost, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment and that Alex Lennicx, a contractor of Robertsedale, Alabama has or is believed to have in his possession or under his control, money or effects belonging to the defendant, or that has 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

Sworn to and subscribed before me this 14th day of January, 1954

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 May Supply Co. on the 5th day of August, 1952 in the Circuit Court of Baldwin County recovered a judgment against H. Y. Miller for the sum of \$268.81 and the further sum of \$10.55, cost of suit; and that Sears Roebuck & Co. on the 25th day of November, 1953 in the Justice of the Peace Court of M. R. Howell, Precinct No. 14 recovered a judgment against H. Y. Miller for the sum of \$68.28 and a further sum of \$4.35, court cost, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Alex Lennocx has, or is believed to have in his possession or under his control, money or effects belonging to the defendant, or that he has 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 Alex Lennocx 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 his answer, he has in his possession, or under his control any money or effects belonging to the defendant; and whether he 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 14th day of January, A. D. 1954


Clerk

no 18141/2 RECORDED

Received in Sheriff's Office
this 15 day of Jan 1954
TAYLOR WILKINS, Sheriff

Received _____ day of _____ 19____

and on 22 day of Jan 1954

I served a copy of the within _____

on _____

By service on Alex Lennex

TAYLOR WILKINS, Sheriff
By *Colleges Decker*

May Supply Co
vs.
Plaintiff

W. J. Miller
Defendant

Alex Lennex
Garnishee

FILED
JAN 19-1954
ALICE L. DUCK, Clerk

MOTION FOR JUDGMENT BY DEFAULT

MAY SUPPLY COMPANY,

PLAINTIFF,

VS:

H. Y. MILLER, d/b/a H. Y. MILLER
PLUMBING COMPANY,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

Comes the Plaintiff by his attorney, and moves the Court to render Judgment by Default in the amount of TWO HUNDRED SIXTY-EIGHT & 81/100 DOLLARS (\$268.81), together with interest thereon, of \$2.50 against the defendant.

There is attached and made a part of this Motion for Judgment by Default, an affidavit of a competent witness sworn to before a Notary Public.


Attorney for Plaintiff

RECORDED

Mar Supply Co

H Y Muller DBW
Muller Publishing

Motion for Judgment
by Default

Filed 8-1-52

Diogenes
Curt

SUMMONS:

THE STATE OF ALABAMA, }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA * GREETING:

YOU ARE HEREBY COMMANDED TO surmon H. Y. MILLER 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 H. Y. MILLER, by MAY SUPPLY COMPANY, Mobile, Alabama.

WITNESS my hand this the 14th day of June, 1952.

Reed J. Smith
Clerk

COMPLAINT

MAY SUPPLY COMPANY,

Plaintiff,

VS:

H. Y. MILLER, d/ba H. Y. MILLER
PLUMBING COMPANY.
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.

COUNT I:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY-EIGHT & 81/100 DOLLARS (\$268.81), together with interest thereon, due from him by account on, to wit; the 29th day of May, 1952, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY-EIGHT & 81/100 DOLLARS (\$268.81), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 29th day of May, 1952, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY-EIGHT & 81/100 DOLLARS (\$268.81), togetherwith interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, towit: the 29th day of May, 1952, which sum of money, with interest thereon, is still unpaid.

There is attached hereto an itemized statement sworn to by the Credit Manager of Attorney for Plaintiff the Plaintiff on May 29, 1952.

Reed J. Smith

James H. Smith

**SUPPLY COMPANY***Distributors*

P. O. BOX 1452 - ROYAL AND CONGRESS STREETS - MOBILE, ALABAMA - TELEPHONE 2-4681

STATEMENT

May 29, 1952

H. Y. Miller Plumbing Co.
Foley, Ala.

INV. NO.	CHARGE	CREDIT	BALANCE
	BALANCE FORWARDED		
32974	111.24		
33839	231.16		
33899	14.24		
C/M		87.83	268.81

e certify the above to be a true and correct
 statement of our account with H. Y. Miller
 Plumbing Co., Foley, Ala. and that we have not
 received payment therefor.
 MAY SUPPLY COMPANY
 by *J. W. Burton*
 J. W. Burton
 Credit Manager

worn and subscribed to before me, a notary public,
 his the 29th day of May 1952.
W. Earl Thompson
 y commission expires 1-10-56.

MAY SUPPLY COMPANY

PHONE
2-4681

DISTRIBUTORS
PIPE, VALVES AND FITTINGS
TOOLS

P. O. Box
1452

PLUMBING AND HEATING MATERIAL

ROYAL AND CONGRESS STREETS

TERMS:

MOBILE 8, ALABAMA

SOLD TO H. Y. Miller Plumbing Co.
Foley, Ala.

SHIPPED TO Same

VIA Called

YOUR
ORDER NO.

DATE
OF ORDER

6/14/49

INVOICE NO.

32974

DATE

6/16/49

QUANTITY	DESCRIPTION	LIST	UNIT	GROSS	DISCOUNT	TOTAL
200'	1/2" Copper Tubing "L"	15.46	cft			30.92
1	#88 Mephisto Expansion Bit					2.70
6	1-1/2 x 6" Sink Tailpiece	.28	ea			1.68
6	1-1/4" Galv. Ells 45°	.56	ea	3.36		
6	1-1/4" Galv. Street Ells	.59	ea	3.54		
				6.90	- 15	5.87
12	Sets with Lavatory Tailpiece & Nuts	.20	ea			2.40
6	Rubber Closet Gaskets	.20	ea		Net	1.20
12	1/2 x C. Galv. Nipples	.065	ea	.78		
12	1/2 x 2" ditto	.077	ea	.92		
12	1/2 x 2-1/2" "	.083	ea	1.00		
				2.70	- 15	2.30
1	S-1050 Conceal Shower Fittings					10.00
1	T-8115 ditto					13.40
3	Pr. B-1010 Lavatory Faucets	4.10	ea			12.30
6	1/2" R. B. Hose Bibbs	.63	ea			3.78
6	1/2" #105 Cadwell Relief Valve	1.30	ea		Net	7.80
6	1-1/2" Galv. Tees	.875	ea	5.25		
6	1-1/2" Galv. Ells	.615	ea	3.69		
				8.94	- 15	7.60
24	1/2" Copper Ells	.094	ea			2.26
24	1/2" Copper Tees	.14	ea			3.36
24	1/2" Copper Couplings	.062	ea			1.49
						109.06
				Sales tax		2.18
						111.24

MAY SUPPLY COMPANY

DISTRIBUTORS

PIPE, VALVES AND FITTINGS

TOOLS

PLUMBING AND HEATING MATERIAL

ROYAL AND CONGRESS STREETS

MOBILE 8, ALABAMA

PHONE
2-4681

P. O. Box
1452

TERMS:

SOLD TO H. Y. Miller Plumbing Co.
Foley, Ala.

SHIPPED TO

VIA

YOUR
ORDER NO.

DATE
OF ORDER

6/25/49

INVOICE NO.

33839

DATE

6/29/49

QUANTITY	DESCRIPTION	LIST	UNIT	GROSS	DISCOUNT	TOTAL
6	1/2" 150# Galv. Unions	.60	ea	3.60		
6	3/4" ditto	.665	ea	3.99		
6	3/8" "	.56	ea	3.36		
6	1" "	.88	ea	5.28		
6	1-1/4" "	1.225	ea	7.35		
6	1-1/2" "	1.485	ea	8.91		
4	2" "	1.85	ea	7.40		
12	3/4 x 1/2" Galv. Reducers	.205	ea	2.46		
12	1/2" Galv. Tees	.25	ea	3.00		
12	1/2" Galv. 90° Ells	.18	ea	2.16		
12	1/2 x 3/8" Galv. Reducers	.17	ea	2.04		
12	1-1/2" Galv. Caps	.37	ea	4.44		
12	1-1/4" ditto	.28	ea	3.36		
12	1/2" Galv. 45° Ells	.195	ea	2.34		
12	3/4 x 1/2" Galv. Bushings	.157	ea	1.88		
24	3/8" Assorted Galv. Nipples C x 6	.106	ea	2.54		
24	1-1/2" ditto C x 6	.31	ea	7.44		
				71.55	- 15	60.82
1	Roll Sand Cloth 25 Yds.					2.40
2	#B-515 Replac Deck Type Faucets	7.00	ea			14.00
2	F-2100 Closet Combinations	29.85				59.70
2	#500 Never Split Closet Seats	4.00	ea			8.00
6	Trip Levers	.50	ea			3.00
48	1/2" C x C Ells	.094	ea			4.51
12	1/2" C to F.I.P. Adapters	.094	ea			1.13
12	1/2" C to M.I.P. Adapters	.094	ea			1.13
6	2" Standard C. I. 1/8 Bends	.44	ea			2.64
9	3" Standard C. I. 1/4 Bends	.70	ea			6.30
6	3 x 2" Std. C. I. Y's	1.08	ea			6.48
3	3 x 5" Closet Bends with Hubs	1.95	ea			5.85
6	2" Std. C. I. Y's	.70	ea			4.20
6	2" Std. C. I. Tees	.70	ea			4.20
4	2" Std. C. I. 1/4 Bends	.51	ea			2.04

Forward

MAY SUPPLY COMPANY

QUANTITY	DESCRIPTION	LIST	GROSS	DISCOUNT	TOTAL
30'	3" Std. C. I. D. H. Soil Pipe	58.08			17.42
15'	3" ditto S. H. ditto	53.24			7.99
50	# Ingot Lead	18.00	C		9.00
2	Setting Seal Rings	.30			.60
6	1# Roll Wire Solder	.75			4.50
6	2 Oz. Cans	.12			.72
					226.63
			Sales tax		4.53
					231.16

Served 6-26 19 52by serving copy of within Summons and
Complaint onH. Y. MillerTaylor Wilkins SheriffBy H. F. Hall Deputy Sheriff

MAY SUPPLY COMPANY,

PLAINTIFF,

VS:

H. Y. MILLER d/ba H. Y. MILLER,
PLUMBING COMPANY

DEFENDANT.

COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

FILED
JUN 14 1952
ALICE J. DUCK, ClerkLAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

PLUMBING AND HEATING MATERIALS • PIPE • VALVES • FITTINGS • TOOLS



P. O. BOX 1452 • ROYAL AND CONGRESS STREETS • MOBILE, ALABAMA • TELEPHONE 2-4681

TERMS:

SOLD TO H. Y. Miller Plumbing Co.
Foley, Ala.

SHIPPED TO Gulf Shores

VIA Truck Line

YOUR ORDER NO. DATE OF ORDER 6/27/49 INVOICE NO. 33899 DATE 6/29/49

QUANTITY	DESCRIPTION	LIST	UNIT	GROSS	DISCOUNT	TOTAL
1	Bundle 1-1/4" Galv. Pipe 63'	22.16	cft			13.96
				Sales tax		.28
						14.24

PLUMBING AND HEATING MATERIALS • PIPE • VALVES • FITTINGS • TOOLS



P. O. BOX 1452 • ROYAL AND CONGRESS STREETS • MOBILE, ALABAMA • TELEPHONE 2-4681

TERMS:

☐ SOLD TO H. Y. Miller Plumbing Co.
Foley, Ala.

☐ SHIPPED TO

VIA

☐
YOUR
ORDER NO.

DATE
OF ORDER 8/15/49

INVOICE NO.

CREDIT

DATE 8/16/49

QUANTITY	DESCRIPTION	LIST	UNIT	GROSS	DISCOUNT	TOTAL
	Commission due you on Sale to Farmer & Merchant Bank, Foley					87.83

5-14-52

Alice French
Clerk