

BON SECOUR FISHERIES, INC.  
a Corporation,

Plaintiff,

VS.

RALPH JAY,

Defendant.

FIRST NATIONAL BANK OF FAIRHOPE,  
Fairhope, Alabama,

Garnishee

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

ANSWER OF GARNISHEE

NOW, on this day, comes the FIRST NATIONAL BANK OF FAIRHOPE, Fairhope, Alabama, Garnishee in the above stated cause, and for answer to the Writ of Garnishment served upon it on the 13th day of July, 1970, upon oath, says that it was not indebted to the above named defendant at the time of service of the garnishment in the above stated cause, or at the time of making its answer hereto: and that it will not be indebted in the future to the said defendant by a contract then existing, or at the time of this summons; and that it has not in its possession, or under its control, personal or real property or things in action, belonging to the said RALPH JAY. And Garnishee having fully answered, prays to be discharged with its reasonable costs in this behalf expended.

FIRST NATIONAL BANK OF FAIRHOPE  
Fairhope, Alabama

By John M. Beasley  
Affiant

STATE OF ALABAMA  
COUNTY OF BALDWIN

Before me, the undersigned Notary Public, personally appeared John M. Beasley, who being first duly sworn, deposes and says:

That he is President of the FIRST NATIONAL BANK OF FAIRHOPE, Fairhope, Alabama, and as such, is authorized to answer garnishments served upon the bank, and that the facts stated in the foregoing affidavit are true and correct and that he has knowledge of the same.

John M. Beasley  
Affiant

Subscribed and sworn to before me on this the 17th day of July, 1970.

Dorothy F. Kauer  
Notary Public, Baldwin County,  
Alabama

FILED

JUL 20 1970

ALICE J. DUCK

CLERK  
REGISTER VOL

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THE STATE OF ALABAMA,  
BALDWIN COUNTY

8901 1/2  
CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid Al Rea, an Officer of Bon Secour Fisheries, Inc., a corporation who being duly sworn, on oath says, that a regular Fall Term of the Circuit Court of Baldwin County, to-wit: on the 13th day of December 1969, Bon Secour Fisheries, Inc., a corporation recovered a judgment against Ralph Jay

for the sum of \_\_\_\_\_ Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that The First National Bank of Fairhope, Fairhope, Alabama

supposed to be indebted to or have effects of the said Ralph Jay in its possession, or under its control, and that he believes process of Garnishment against said Ralph Jay is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 10th day of June A. D. 1970

Alice J. Duck  
NOTARY PUBLIC  
STATE AT LARGE

NO. \_\_\_\_\_

# CIRCUIT COURT

VS.

## AFFIDAVIT Garnishment on Judgment

Filed this \_\_\_\_\_ day of \_\_\_\_\_

19\_\_\_\_

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.

*First National  
Bank of Fairhope*

*Fairhope, Alabama*

*"on Mobile Bay"*

July 17, 1970

JOHN M. BEASLEY  
PRESIDENT

Mrs. Alice J. Duck  
Clerk of Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Duck:

We have taken the liberty of executing the enclosed legal-  
appearing form. Mr. Jay is not indebted to us nor are we  
indebted to him.

If we need to do anything further, please let us know.

Yours truly,

*John M. Beasley*

President

JMB:k  
encl.

**STATE OF ALABAMA**  
**Baldwin County**

CIRCUIT COURT, BALDWIN COUNTY

.....FALL..... TERM, 1970..

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular.....Fall..... Term, 19.....70..... of the Circuit Court of Baldwin County, to-wit: On the .....13th.....day of.....December....., 19.....69.., being a regular day of said term, .....Ben Secour Fisheries, Inc., a corporation.....  
 .....  
 recovered judgment against Ralph Jay.....

for the sum of .....ONE THOUSAND SIX HUNDRED.....00/100Dollars, and cost of suit, and affidavit having been made by .....Al Rea, an officer of Plaintiff corporation..... that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

.....First National Bank of Fairhope, Fairhope, Alabama.....  
 .....  
 .....

has or is believed to have in .....its..... possession, or under .....its..... control money or effects belonging to said defendant.....Ralph Jay..... or that .....it..... is, or is believed to be indebted to said defendant Ralph Jay 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 .....First National Bank of.....  
Fairhope, Fairhope, Alabama.....  
 .....

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, on the.....Monday in ..... A. D. 19....., then and there within the three first days of the.....Monday in ..... A. D. 19..... the service of the garnishment, or at the making.....its..... answer, or at any time intervening the time of serving the garnishment, and making the answer.....it..... was ..... indebted to said defendant Ralph Jay..... and whether .....it..... will not be indebted in future to said defendant Ralph Jay..... by a contract then existing, and whether by a contract then existing ..... 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 .....it..... has not in .....its..... possession or under .....its..... control money or effects belonging to the defendant .....Ralph Jay.....

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

Witness, ALICE J. DUCK, Clerk of said Court, this.....13..... day of.....July....., A. D., 1970..Issued .....13..... day of.....July..... A. D., 1970..

ATTEST:

.....Alice J. Duck..... Clerk.

CIRCUIT COURT, BALDWIN COUNTY

No. 8901 1/2

VS. }

GARNISHMENT ON JUDGMENT

Issued \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Attorney

RICHARD C. LACEY

*Attorney-At-Law*

FAIRHOPE, ALABAMA 36532

July 10, 1970

Mrs. Alice Duck,  
Circuit Clerk, Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

RE: Bon Secour Fisheries, Inc.

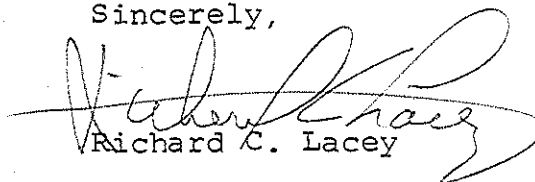
vs.

Ralph Jay

Dear Mrs. Duck:

Please forward the enclosed garnishment to the  
First National Bank of Fairhope for handling.

Sincerely,



Richard C. Lacey

RCL/sf

Enclosure

State of Alabama

BALDWIN COUNTY

TO RALPH JAY....., Defendant.....:

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

..... BON SECOUR FISHERIES, INC., a corporation....., Plaintiff.....,  
versus RALPH JAY....., Defendant.....,

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

Ralph Jay.....  
has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 13.....day of July....., 1940.....

Archie Duck  
Clerk of the Circuit Court.



TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING 1 PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ 8.60  
PROCESS(ES) OR A TOTAL OF \$ 10.10

Sheriff claims 86 miles at  
Ten Cents per mile Total \$ 8.60  
TAYLOR WILKINS, Sheriff  
BY Deputy Sheriff  
DEPUTY SHERIFF

Received 14 day of July 1920  
and on 15 day of Aug 1920  
I served a copy of the within notice  
Raymond Jay  
By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
Colburn D.S.

86

no. 8901 1/2

B-8

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

TO

Bon Secour Fisheries  
Plaintiff.....

VS.

Raymond Jay  
Bon Secour, ALA

Defendant.....

Check with Mr  
Bon Secour Fisheries  
John Ray Nelson em  
TELL YOU WHERE HE LIVES

D. Lacey

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY  
FALL TERM, 1970

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Fall Term, 1970, of the Circuit Court of Baldwin County, to-wit: On the 13th day of December, 1969, being a regular day of said term, Bon Secour Fisheries, Inc., a corporation

recovered judgment against Ralph Jay

for the sum of ---ONE THOUSAND SIX HUNDRED --- 00/100 Dollars, and cost of suit, and affidavit having been made by Al Rea, an officer of Plaintiff corporation that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

First National Bank of Fairhope, Fairhope, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Ralph Jay or that it is, or is believed to be indebted to said defendant Ralph Jay 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 First National Bank of Fairhope, Fairhope, Alabama

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, on the Monday in A. D. 1970, then and there within the three first days of the Monday in A. D. 1970, the service of the garnishment, or at the making of its answer, or at any time intervening the time of serving the garnishment, and making the answer. it was indebted to said defendant Ralph Jay and whether it will not be indebted in future to said defendant Ralph Jay by a contract then existing, and whether by a contract then existing 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 it has not in its possession or under its control money or effects belonging to the defendant Ralph Jay

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

Witness, ALICE J. DUCK, Clerk of said Court, this 13 day of July, A. D., 1970

Issued 13 day of July, A. D., 1970

ATTEST:

Alice J. Duck, Clerk.

CIRCUIT COURT, BALDWIN COUNTY

No. 8901 1/2

*Bur Secour Fisher*

VS.

GARNISHMENT ON JUDGMENT

*Ralph Jay*

Issued \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

*R. Lacey*  
Attorney

Moore Printing Co. - Bay Minette, Alabama

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING 1 PROCESSES) AND  
TRAVEL EXPENSE ON EACH OF \$ 1.50  
PROCESSES) OR A TOTAL OF \$ 1.50

Received 14 day of July 1970  
and on 11 day of July 1970  
I served a copy of the within  
on *First National Bank of Thibodaux*  
By service on 181 National Bank of Thibodaux

TAYLOR WILKINS, Sheriff  
By *[Signature]* D. S.

no miles