

T. J. DAVIDSON, doing business  
as PEOPLE'S MARKET,  
VS.  
SYBOL MADDOX,  
Defendant,  
BERNARD AND BYRD, INC., A  
Corporation,  
Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to notify Sybol Maddox that on  
the \_\_\_\_\_ day of January, 1954, a writ of garnishment in the  
above stated case was issued to Bernard and Byrd, Inc., a Corpora-  
tion, as garnishee.

Witness my hand this 29th day of January, 1954.

Alice J. Duck  
Clerk.

FILED

1-29-54

ALICE J. DUCK, Register

Received in Sheriff's Office  
the 36 day of Jan, 1954  
TAYLOR WILKINS, Sheriff

MO 195-812

NOTICE

T. J. DAVIDSON, doing  
business as PEOPLE'S MARKET,

VS.

SYBOL MADDOX,

*Hapleton*

Defendant,

BERNARD AND BYRD, INC., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on 30 day of Jan 1954  
I served a copy of the within  
on \_\_\_\_\_

By service on

*Sybol Maddox*

TAYLOR WILKINS, Sheriff

*By Mitchell*

JAN 29 1954  
CLERK L. BROWN

T. J. DAVIDSON, doing business  
as PEOPLE'S MARKET,

Plaintiff,

VS.

SYBOL MADDOX,

Defendant,

BERNARD & BYRD, INC., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 1958 $\frac{1}{2}$

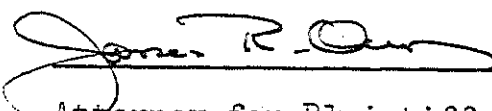
### MOTION TO DISALLOW EXEMPTIONS

Now comes the Plaintiff in the above styled cause and moves the Court to disallow and hold for naught the claim of exemption heretofore filed in this cause by the Defendant, Sybol Maddox, and as grounds for said motion assigns the following separately and severally:

1. The said claim of exemption does not comply with Section 651, Title 7 of the 1940 Code of Alabama.

2. The said claim of exemption is excessive.

Plaintiff further moves the Court to set a day for the hearing of this motion and to give the Defendant or his Attorney notice of the filing of this motion and the day set for hearing same.


  
Attorney for Plaintiff.

### ORDER

The above motion having been presented to me on this date, it is hereby ordered that the 24 day of February, 1954, at 9 o'clock be set as a day and time for hearing same.

It is further ordered that a copy of the above motion and this order be served on C. L. Thompson as the Attorney of record for the said Defendant, Sybol Maddox.

ORDERED, ADJUDGED AND DECREED on this the 10 day of February, 1954.

  
Judge.

Received 13 day of Feb 1954  
and on 16 day of Feb 1954  
I served a copy of the within  
on \_\_\_\_\_

By service on C. L. Thompson

TAYLOR WILKINS, Sheriff  
By Pat Seller D. S.

1958 1/2

MOTION TO DISALLOW  
EXEMPTIONS

T. J. DAVIDSON, doing business  
as PEOPLE'S MARKET,

Plaintiff,

VS.

SYBOL MADDOX,

Defendant,

BERNARD & BYRD, INC., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 1958 1/2

FILED

FEB 16 1954

CLERK OF COURT

serve copy on  
C. L. Thompson

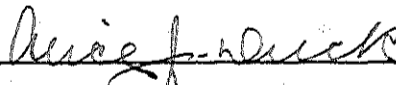
AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County James R. Owen, who being duly sworn, deposes and says that T. J. Davidson, doing business as People's Market, at the September 17, 1953, Term of the Circuit Court of Baldwin County recovered a judgment against Sybol Maddox for the sum of Two Hundred Eighty Two and 35/100 Dollars (\$282.35) and the further sum of Thirteen and 05/100 Dollars (\$13.05) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Bernard and Byrd, Inc., a Corporation, 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 it is to be liable to her 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.



Sworn to and subscribed before me on this the 29th day of January, 1954.



Clerk of the Circuit Court of Baldwin County, Alabama

FILED  
 1-29-54

ALICE J. DUCK, Register

1958 1/2

AFFIDAVIT ON JUDGMENT

T. J. DAVIDSON, doing  
business as PEOPLE'S MARKET,

VS.

SYBOL MADDOX,

Defendant,

BERNARD AND BYRD, Inc., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

FILED

JAN 29 1954

ALICE J. BUCK, Clerk

WRIT ON JUDGMENT

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas James R. Owen has made affidavit as required by law that T. J. Davidson, doing business as People's Market, at the September 17, 1953, Term of the Circuit Court of Baldwin County recovered a judgment against Sybol Maddox for the sum of Two Hundred Eighty Two and 35/100 Dollars (\$282.35), and the further sum of Thirteen and 05/100 Dollars (\$13.05), cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Bernard and Byrd, Inc., a Corporation, 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 to be liable to her 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 Bernard and Byrd, Inc., a Corporation, to be and appear at the next Term of Circuit Court of Baldwin County to be held 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 her 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 the said Court at office, this 29<sup>th</sup> day of January, 1954.

FILED

1-29-54

ALICE J. DUCK, Register

*Alice J. Duck*  
 Clerk.

Received in Sheriff's Office  
this 30 day of Jan, 1954  
TAYLOR WILLIAMS, Sheriff

**EXECUTED**

This 2<sup>nd</sup> day of Feb 1954  
by serving a copy of the within on

B. G. Miller - office mgr  
W. H. HOLCOMBE, Sheriff  
Mobile County, Ala.

By: H. B. Sanders D.S.

1958 1/2 229  
**WRIT ON JUDGMENT**

T. J. Davidson, doing  
business as PEOPLE'S MARKET,  
VS.

SYBOL MADDOX,

Defendant,

BERNARD AND BYRD, INC., A  
Corporation,

Garnishee.

2-28  
S. B. G. Miller OM

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

**FILED**

JAN 29 1954

ALICE A. DICK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

T. J. DAVIDSON,

Plaintiff,

VS:

SYBOL MADDOX,

Defendant,

and

BERNARD & BYRD, INC.,

a corporation

Garnishee

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

To the Sheriff or Any Constable of said County-- Greeting:

You are hereby commanded to notify the said plaintiff that on the 6th day of February, 1954, the said defendant filed in said cause his claim of exemptions. You are required to execute this process instantter, and return the same immediately upon the execution thereof.

Witness my hand this 6<sup>th</sup> day of Feb, 1954.

*Alice J. Duck*  
Clerk of Circuit Court

STATE OF ALABAMA

BALDWIN COUNTY

To T. J. Davidson, the Plaintiff in the Case of T. J. Davidson vs. Sybol Maddox:

You are hereby notified that Sybol Maddox, the defendant in the above named action, has this day filed with me a claim in writing, verified by oath, claiming as exempt to him the following described property:

All my wages now earned and due or otherwise payable from Bernard & Byrd, Inc., a Corporation, in the amount of \$1000.00 in money.

*Alice J. Duck*

FILED

2-6-54

ALICE J. DUCK, Register

no 1958 1/2

CP 806

242

*[Signature]*

2-11<sup>th</sup> / 5 B.G. Miller o.m

**EXECUTED**

This 11<sup>th</sup> day of Feb 1954

by serving a copy of the within on  
B.G. Miller-office mgr

W. H. HOLCOMBE, Sheriff  
Mobile County, Ala.

By: H.B. Sanders D.S.

FILED  
FEB 6 1954  
AUGIE J. DICK, CLERK

Received \_\_\_\_\_ day of \_\_\_\_\_  
and on 8 day of Feb 1954  
I served a copy of the within  
on \_\_\_\_\_

By service on \_\_\_\_\_  
James O'Brien  
TAYLOR WILKINS, Sheriff  
By W. H. Holcombe

no 1958 1/2

AMENDED CLAIM OF EXEMPTION

STATE OF ALABAMA  
BALDWIN COUNTY

1  
1  
1

CLAIM OF SYBOL MADDOX FOR  
EXEMPTION OF PERSONAL  
PROPERTY.

I, SYBOL, MADDOX, a resident of Baldwin County, State of Alabama, do hereby declare that I am a bona fide resident of the State of Alabama; that I am entitled to claim an exemption, of personal property according to the provision of Code 1940, Tit. 7 section 629, and in accordance with the provision of Code 1940, Tit. 7 Section 633, I hereby file this claim of exemption.

I claim as exempt from levy and sale under execution, garnishment, or other process issued for the collection of any debt owing by me, the personal property set out below, claiming no household property or other personal property of like kind and having no automobile, horse, or livestock. I hereby claim the following said property which does not exceed in value \$1,000 in money above the mortgage, or other lien against same and being wages due and unpaid, now owing to me or to be owed and payable to me not exceeding the sum of \$1,000 in money from Bernard and Byrd, Inc., a corporation. Said property being located in the city of Mobile, Mobile, Alabama.

Witness my hand this the 24 day of February, 1954.

Sybol Maddox

Sworn to and subscribed before me this 24 day of February, 1954.

Notary Public  
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

EX-105  
PAGE 15

I, Sybil Maddox, a resident of the State of Alabama and county aforesaid, do hereby make and file this my declaration in writing, under oath, that I have claimed and do claim and set apart as being exempt from levy, seizure, or sale under execution or other process for the collection of debts, the following described property owned by me, to-wit:

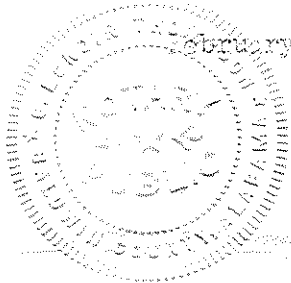
All my wages now earned and due or otherwise payable from Bernard & Byrd, Inc., a Corporation, in the amount of \$100.00 in money.

Sybil Maddox

Sworn to and subscribed before me this the 6th day of

February, 1954.

C. E. R. Thompson  
NOTARY PUBLIC



STATE OF ALABAMA, BALDWIN COUNTY

Filed 2-6-54 10:20 A.M.

Recorded E. & L. book 5 page 15

W. R. Stuart  
Judge of Probate

ES

FILED  
FEB 6 1954  
ALICE J. DUCK, Clerk



67  
100  
100

R-75  
Sybil Mabbey  
Stapleton

STATE OF ALABAMA

BALDWIN COUNTY

T. J. DAVIDSON,

Plaintiff,

vs:

SYBOL MADDOX,

Defendant,

and

BERNARD & BYRD, INC.,

a corporation

Garnishee

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

To the Sheriff or Any Constable of said County— Greeting:

You are hereby commanded to notify the said plaintiff that on the 6th day of February, 1954, the said defendant filed in said cause his claim of exemptions. You are required to execute this process instantler, and return the same immediately upon the execution thereof.

Witness my hand this 6th day of Feb, 1954.

Alice J. Duck  
Clerk of Circuit Court

STATE OF ALABAMA

BALDWIN COUNTY

To T. J. Davidson, the Plaintiff in the Case of T. J. Davidson vs. Sybol Maddox:

You are hereby notified that Sybol Maddox, the defendant in the above named action, has this day filed with me a claim in writing, verified by oath, claiming as exempt to him the following described property:

All my wages now earned and due or otherwise payable from Bernard & Byrd, Inc., a Corporation, in the amount of \$1000.00 in money.

Alice J. Duck

1958 1/2

copy  
Bernard Byrd -

FILED

FEB 6 1954

ALICE L. DUCK, Clerk

T. J. DAVIDSON, doing business  
as PEOPLE'S MARKET,

VS.

SYBOL MADDOX,

Defendant,

BERNARD AND BYRD, INC., A  
Corporation,

Garnishee.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA )

BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to notify Sybol Maddox that on  
the 30<sup>th</sup> day of June, 1954, a writ of garnishment in  
the above stated case was issued to Bernard and Byrd, Inc., a  
Corporation, as garnishee.

Witness my hand this 30<sup>th</sup> day of June, 1954.

*Doris J. [Signature]*  
Clerk

Received in \_\_\_\_\_  
This 30 day of June, 1954  
TAYLOR WILKINS, Sheriff

Stapleton

1958 1/2 A

J. J. Davidson

Vs

Sybil Maddox

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on 2 day of July, 1954  
served a copy of the within \_\_\_\_\_

by service on Sybil Maddox

TAYLOR WILKINS, Sheriff

By J. J. Davidson, D. S.

FILED

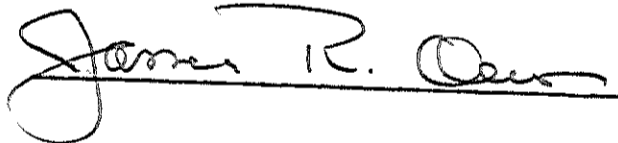
JUN 30 1954

ALICE J. DUCK, Clerk

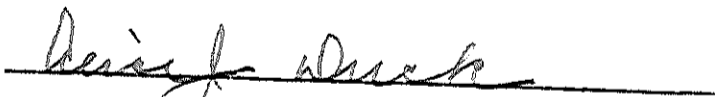
AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA )  
                                  \*  
BALDWIN COUNTY     )

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County James R. Owen, who being duly sworn, deposes and says that T. J. Davidson, doing business as People's Market, at the September 17, 1953, Term of the Circuit Court of Baldwin County recovered a judgment against Sybol Maddox for the sum of Two Hundred Eighty Two and 35/100 Dollars (\$282.35) and the further sum of Thirteen and 05/100 Dollars (\$13.05) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Bernard and Byrd, Inc., a Corporation, 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 it 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.



Sworn to and subscribed before me on  
this the 30th day of June, 1954.



Clerk of the Circuit Court of  
Baldwin County, Alabama

1958 1/2 A

J. J. Davidson

vs.

Sybol Mudd

FILED

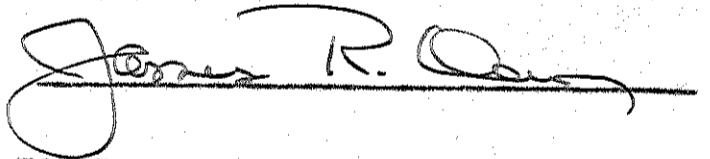
JUN 30 1954

ALICE J. DUCK, Clerk

AFFIDAVIT ON JUDGMENT

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for said County James R. Owen, who being duly sworn, deposes and says that T. J. Davidson, doing business as People's Market, at the September 17, 1953, Term of the Circuit Court of Baldwin County recovered a judgment against Sybol Maddox for the sum of Two Hundred Eighty Two and 35/100 Dollars (\$282.35) and the further sum of Thirteen and 05/100 Dollars (\$13.05) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Bernard and Byrd, Inc., a Corporation, 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 it is to be liable to her 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.



Sworn to and subscribed before me on  
this the \_\_\_\_\_ day of June, 1954.

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Clerk of the Circuit Court of  
Baldwin County, Alabama

# BERNARD and BYRD, INC.

GENERAL CONTRACTORS

P. O. Box 1688



PHONE 3-2554

JOB No:

1809 REDDY STREET

MOBILE 9, ALABAMA

July 6, 1954

Mrs. Alice J. Duck  
Clerk of Circuit Court  
Bay M. nette, Alabama

Dear Mrs. Duck:

This morning Mr. Sanders of the Mobile Sheriff's Department served us with a Writ on Judgment against Sybol Maddox issued by your court.

Mr. Bernard advised Mr. Sanders that Sybol Maddox is no longer employed by Bernard & Byrd, Inc., and Mr. Sanders told us to write you and give you that information.

This is, therefore, to advise you that Sybol Maddox is not employed by Bernard & Byrd, Inc. nor does Bernard, & Byrd, Inc., owe Sybol Maddox any money.

Please advise us what else is necessary for us to be released from this writ.

Yours very truly,

BERNARD & BYRD, INC.

  
B. A. Miller, Jr.  
Accountant

bs

1958 1/2

J. J. Davidson

U.C.

Sybil Maddox

Ans -

FILED

JUL 7 1954

ALICE J. BUCK, Clerk