

THE STATE OF ALABAMA

BALDWIN

COUNTY

CIRCUIT

COURT AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

Whereas, at the Last Term, 19 70, of the Circuit
Court of Baldwin County Kerr McGee Chemical Corporation, A Corporation
Plaintiff

recovering a judgment against W.E. Brackens

Defendant for the sum of Nine Thousand, Nine
Hundred, Twenty Seven & No/100 Dollars and cost of suit; and whereas,
Jackson W. Stokes

ha^s made
affidavit as required by law, that Farmers and Merchants Bank
is supposed to be indebted
to said Defendant or ha^{ve} effects of said Defendant in it's possession or under it's
control, and that the Y believe that process of Garnishment against the said
W.E. Brackens

is necessary to obtain satisfaction of said judgment.

THESE ARE THEREFORE TO COMMAND YOU, That you summon the said

Farmers and Merchants Bank

to be and appear in the Circuit Court of Baldwin County within thirty
days from the service of this writ, then and there to answer, on oath, whether, at the time of this service
of the Garnishment or the time of making it's answer at any time
intervening between the time of serving the Garnishment and making the answer, they were
indebted to the Defendant, and whether if they will not be indebted in future to him
by a contract then existing, and whether by a contract then existing they are liable to him
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
they ha^{ve} not in their possession or under their
control money or effects belonging to the Defendant.

The Cost of Court in the original suit is \$ 33.70, the Court Cost of this Garnishment proceed-
ing to date is \$ _____

If said answer shows an indebtedness due or to become due by the Garnishee to the Defendant by contract
then existing, you are commanded to answer further whether or not such indebtedness is for wages, salaries,
or other compensation of laborers or employees residents of this state for personal services, and if so, you are
commanded (a) to retain 25% thereof during such period of time as is necessary to accumulate a sum equal to
the amount shown on this writ as due (b) at which time you will pay the same to the clerk of this Court; and
(c) should the employment of the said Defendant be terminated, you will report such termination to the clerk
of this Court within 15 days after the termination and pay into court all sums as have been withheld from the
Defendant's wages, salaries or other compensation.

Witness, this 3rd day of July Aug, 19 70

AFFIDAVIT IN GARNISHMENT ON JUDGMENT

THE STATE OF ALABAMA
BALDWIN COUNTY }

Before me Alice J. Duck

the Clerk of the Circuit Court of said County, personally appeared Jackson W. Stokes who, being duly sworn, depose \$ and say \$ that

Kerr McGee Chemical Corporation, A Corporation

Plaintiff recovered a judgment at the last Term, A. D., 1970 of said Circuit Court of said County, against W.E. Brackens Defendant.

for the sum of Nine thousand, Nine Hundred, Twenty Seven & No/100 Dollars and the further sum of _____ Dollars, cost of suit;

and that Farmers and Merchants Bank is

supposed to be indebted to the said Defendant, or to have effects of the said Defendant in it's possession or under it's control, and that the believe that process of Garnishment against the said W.E. Brackens is necessary to obtain satisfaction of said judgment.

[Signature]

Subscribed and sworn to before me, this _____ day of July, A. D., 1970

Clerk

No. 9177 1/2

THE STATE OF ALABAMA

Baldwin COUNTY

Baldwin COURT

Kerr-McGee Chemical Corp.

vs.

W.E. Brackens

**WRIT OF GARNISHMENT
ON JUDGMENT**

Issued _____, 19____

Clerk

Jackson W. Stokes
Attorney

Received in office Aug 4, 1970

Taylor Wilkins
Sheriff

Executed by serving _____

cop. _____ of the within Writ of Garnishment on the within named:

Farmers & Merchants Bank

[Signature]
[Signature]

this 13 day of Aug, 1971

VOL

65 PAGE 527

Shiff claimed 72 miles at 7.20
Ten Cents per mile Total 7.20
TAYLOR WILKINS, Sheriff
Childress
DEAVLOR WILKINS, SHERIFF OF BALDWIN COUNTY, ALABAMA, CLAIM \$100.00 FOR CLERK'S FEE, PROCESSIES / TRAVEL EXPENSES, ETC. ON 7.20 PROCESSIES OR A TOTAL OF 8.70

[Signature]
Sheriff

THE STATE OF ALABAMA,
BALDWIN COUNTY

9177 1/2
CIRCUIT COURT

Gladys Clark

Coffee

Personally appeared before me, ~~W. E. Brackens~~, Clerk of the Circuit Court in and for ~~Baldwin~~ ^{XXXX} Baldwin County and State aforesaid **Jackson W. Stokes ' as attorney for Kerr-McGee Chemical Corp.**

who being duly sworn, on oath says, that a regular _____ Term of the Circuit Court of Baldwin County, to-wit: on the 17th day of June 1970, **Kerr-McGee Chemical Corporation**

recovered a judgment against **W.E. Brackens**

_____ for the sum of **Nine thousand Nine hundred and twenty-seven and No/100** Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that **South Baldwin Bank and Farmers and Merchants Bank are**

_____ **W.E. Brackens** supposed to be indebted to or have effects of the said _____ in _____ **it's** _____ **it's** _____ possession, or under _____ control, and that he believes process of Garnishment against said _____ **W.E. Brackens** is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 31st day of July A. D. 19 70


As Attorney for **Kerr-McGee Chemical Corp.**

65

PAGE 525

Filed 8-3-70
Alice J. Black

VOL

Henry R. Black
Clark

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

POST OFFICE BOX 356

March 1, 1971

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

Re: Kerr-McGee vs W. E. Brackins
Case No. 9177½

Dear Mrs. Duck:

I would appreciate your asking the court to dismiss the garnishment heretofore filed against the Farmers and Merchants Bank of Foley as a garnishee in the above matter. It appears from my file that the bank has made a reasonable and fair answer to the garnishment in this cause.

Thanking you and with my personal regards, I am,

Sincerely,



Jackson W. Stokes

JWS/jf

DALEVILLE OFFICE:
STOKES & NOMBERG
P. O. BOX 652
DALEVILLE, ALABAMA 36322

TELEPHONE { 598-6261
 598-6262

JACKSON W. STOKES
JOEL M. NOMBERG

9177½

CASE NUMBER

Kerr McGee Chemical Corp.

Plaintiff

VS.

W. E. Brackens

FILED

Defendant

AUG 18 1970

CLERK
THE STATE OF ALABAMA
Baldwin County

Circuit Court

ANSWER OF GARNISHEE

1. DEFENDANT EMPLOYED BY GARNISHEE when Writ received, or when making this answer, or during intervening time, and WILL WITHHOLD from salary, wages, or compensation, according to requirements of law stated in writ received, and will then pay total into said Court.

2. Defendant NOT EMPLOYED — Garnishee NOT INDEBTED when writ received, or when making this answer, or during intervening time, and have not in possession money or belongings of defendant.

3. In response to the garnisheement on judgment in this case the said Farmers & Merchants Bank reports that W. E. Brackens that they owed \$135.36, Cashier's check #69853 enclosed.

Jay W. Rice, Cashier
AUG 17 1970
Sworn to and subscribed before me. the day of 19.....
Baldwin County, Alabama
My Commission Expires Dec. 20, 1970

Received in office _____, 19____

Sheriff

Executed by serving _____
cop _____ of the within Notice of Garnish-
ment on the within named.

W. Bracken

on the 13 day of May, 1920

Sheriff

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

vs. Plaintiff

Defendant

Garnishee

Notice to Defendant of Issuing
Garnishment

Attorney

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20

TAYLOR, WILKINS, Sheriff

TAYLOR, WILKINS, SHERIFF OF TALLADGA

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 1 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 7.20

PROCESS(ES) OR A TOTAL OF \$ 8.40

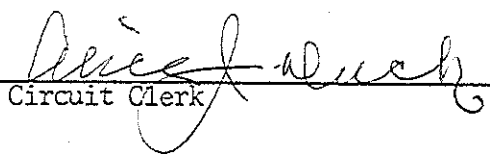
STATE OF ALABAMA

COUNTY OF COFFEE

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons W. E. Brackens, to be and appear within thirty days from the date of service hereof in the Circuit Court of Baldwin County, Alabama, and plead, answer or demur to the complaint of Kerr McGee Chemical Corporation, a Corporation .

Witness my hand this 24 day of March, 1970.


Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

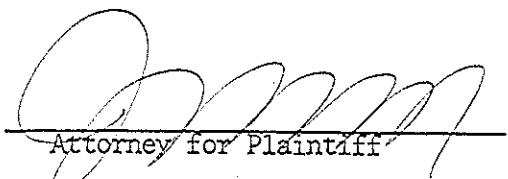
W. E. BRACKENS,

Defendant

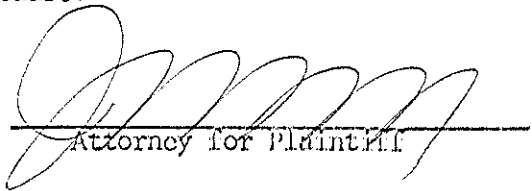
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendant the sum of Nine Thousand, Nine Hundred, twenty seven Dollars and six cents (\$9,927.06), for goods, merchandise and chattels sold by the Plaintiff to the Defendant during the years of 1968 and 1969, which sum of money, with interest thereon is due and unpaid.


Attorney for Plaintiff

I, Jackson W. Stokes, Attorney for Plaintiff, do hereby acknowledge myself as security for cost in this cause.


Attorney for Plaintiff

Plaintiff's Attorney:
Jackson W. Stokes
Attorney at Law
P. O. Box 356
Elba, Alabama 36323

Defendant's Address:
Foley, Alabama

FILED

MAR 24 1970

ALICE J. DIXIE

9177

Handwritten signature

Received in office _____, 19__

AUG 4 - 1970

Sheriff

TAYLOR WILKINS
SHERIFF

Executed by serving _____
cop _____ of the within Notice of Garnish-
ment on the within named.

W. J. Brackens

on the 13 day of Aug, 1970

Taylor Wilkins
Sheriff

Sheriff claims 77 miles at
Ten Cents per mile Total \$7.20
TAYLOR WILKINS, Sheriff

TAYLOR WILKINS, SHERIFF OF BALDWIN

CITY OF BALDWIN, CLAIM \$1.50 EACH

EXPENSE ON 1

EXPENSE ON 7.20

(ES) OR 8.70

No. 9127 1/2

THE STATE OF ALABAMA

Baldwin COUNTY

CIRCUIT COURT

Kerr. Mc Gee Chemical
Corp.

Plaintiff

vs.

W. E. Brackens

Defendant

Garnishee

Notice to Defendant of Issuing
Garnishment

Jackson W. Stokes
Attorney

IN THE CIRCUIT COURT

PRESENT _____ Term, 1970

KERR MCGEE CHEMICAL CORPORATION, A CORPORATION

Plaintiff

Versus

W.E. BRACKEN S

Defendant

SOUTH BALDWIN BANK

Garnishee

To W.E. BRACKENS

You will take notice that affidavit having been made in the above stated cause, that

South Baldwin Bank

is supposed to be indebted to the said defendant W.E. Brackens

or have effects of the said W.E. Brackens in it's
possession or under it's control and that it believe s that process of garnish-
ment is necessary against said W.E. Brackens to obtain
satisfaction of said judgment.

That Writ of Garnishment has this day been issued to the said South Baldwin Bank

_____ commanding it _____ to be and appear before
the Circuit Court to be holden for Baldwin County, Alabama, and within thirty days
after service thereof, then and there to answer on oath what it's indebtedness to said _____

W.E. Brackens at the time of service of this Writ of Garnishment, or at the time of making it's answer, and whether it will not be indebted in future to him by contract then existing, and whether they have not in their possession or under their control personal or real property or things in action belonging to defendant W.E. Brackens

Witness my hand this the 3rd day of July Aug, 1970

Code 1940, Tit. 7, Sec. 1000.

Clerk

248/3770

THE STATE OF ALABAMA

BALDWIN

COUNTY

CIRCUIT

COURT AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

Whereas, at the Last Term, 19 70, of the CircuitCourt of Baldwin County Kerr McGee Chemical Corporation, A
Corperation

Plaintiff

recovering a judgment against W.E. BrackensDefendant for the sum of Nine Thousand, NineHundred, Twenty Seven & No 100 Dollars and cost of suit; and whereas,Jackson W. Stokes

ha made

affidavit as required by law, that South Baldwin Bank

is

supposed to be indebted

to said Defendant or have effects of said Defendant in it's possession or under it'scontrol, and that they believe that process of Garnishment against the saidW.E. Brackens

is necessary to obtain satisfaction of said judgment.

THESE ARE THEREFORE TO COMMAND YOU, That you summon the said

South Baldwin Bankto be and appear in the Circuit Court of Baldwin County within thirty days from the service of this writ, then and there to answer, on oath, whether, at the time of this serviceof the Garnishment or the time of making it's answer at any timeintervening between the time of serving the Garnishment and making the answer, they wereindebted to the Defendant, and whether they will not be indebted in future to himby a contract then existing, and whether by a contract then existing they are liable to him

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

they have not in their possession or under their

control money or effects belonging to the Defendant.

The Cost of Court in the original suit is \$ 33.70, the Court Cost of this Garnishment proceeding to date is \$ _____

If said answer shows an indebtedness due or to become due by the Garnishee to the Defendant by contract then existing, you are commanded to answer further whether or not such indebtedness is for wages, salaries, or other compensation of laborers or employees residents of this state for personal services, and if so, you are commanded (a) to retain 25% thereof during such period of time as is necessary to accumulate a sum equal to the amount shown on this writ as due (b) at which time you will pay the same to the clerk of this Court; and (c) should the employment of the said Defendant be terminated, you will report such termination to the clerk of this Court within 15 days after the termination and pay into court all sums as have been withheld from the Defendant's wages, salaries or other compensation.

Witness, this 3rd day of July Aug, 19 70.
 Clerk.

AFFIDAVIT IN GARNISHMENT ON JUDGMENT

THE STATE OF ALABAMA

BALDWIN

COUNTY

Before me Alice J. Duck

the Clerk of the Circuit Court of said County, personally appeared Jackson W. Stokes

who, being duly sworn, depose s and say s that

Kerr McGee Chemical Corporation, A Corporation

Plaintiff recovered a judgment at the Last Term, A. D., 19 70 of said

Circuit Court of said County, against W.E. Brackens

Defendant

for the sum of Nine Thousand, Nine Hundred, Twenty Seven & No/100 Dollars

and the further sum of _____ Dollars, cost of suit;

and that South Baldwin Bank is

supposed to be indebted to the said Defendant, or to have effects of the said Defendant in it's

possession or under it's control, and that they believe that process of Garnishment against

the said W.E. Brackens

is necessary to obtain satisfaction of said judgment.

[Signature]

Subscribed and sworn to before me, this _____ day of July, A. D., 19 70

Clerk

No. <u>9177 1/2</u>	THE STATE OF ALABAMA	<u>Baldwin</u> COUNTY	COURT	<u>Kerr McGee Chemical Corp.</u>	VS.	<u>W.E. Brackens</u>	WRIT OF GARNISHMENT ON JUDGMENT	Issued <u>Aug 2</u> , 19 <u>70</u> <u>Alice J. Duck</u> Clerk	<u>Jackson W. Stokes</u> Attorney
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Received in Office

AUG 4 - 1970, 19

TAYLOR WILKINS
SHERIFF

Executed by serving

cop of the within Writ of Garnishment on the within named:

South Baldwin Bank
Landolt & Co. Inc.

VOL

on this 13 day of Aug, 1970

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73
Taylor Wilkins
TAYLOR WILKINS
COUNTY, ALABAMA, CIVIL 1970
FOR SERVING
TRAVEL EXPENSE ON PAGE OF 1970
Jackson W. Stokes
Sheriff