

FIELD ENTERPRISES EDUCATIONAL
CORPORATION

Plaintiff

VS

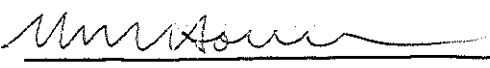
ALONZO O'BANNON AND VIRGINIA
O'BANNON, jointly and individually

Defendants

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

CASE NO. 10,274

Plaintiff claims of the defendants TWO HUNDRED SIXTY-FIVE and 92/100 (\$265.92) DOLLARS, money due from them by account on December 2, 1969, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.


WILLIAM L. HOWELL
Attorney for Plaintiff

Serve the defendants at:

35 Brownwood Avenue
Bay Minette, Alabama 36507

During Evening

His emp: Standard Furniture
Bay Minette, Ala.

During Day

FILED

MAR 9 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

STATEMENT IN ACCOUNT WITH



FIELD ENTERPRISES EDUCATIONAL CORPORATION

MERCHANDISE MART PLAZA

CHICAGO, ILLINOIS 60654

Virginia W. O'Bannon & Alonzo O'Bannon

35 Brownwood Ave.

Bay Minette, Alabama 36507

CHICAGO February 9, 19 72

ACCOUNT NO. 1170-174355

Date		Items—Product/Other	Cost	Present Balance	
12/02/69		Original Purchase		\$265 92	
	1	WORLD BOOK	240 00		
	1	DICTIONARY			
		Additional Purchases			
		Finance Charge	44 60		
		Tax	9 82		
		Transportation	5 50		
		Total	\$299 92	Grand Total	

Date	Amount
12/02/69	10 00
03/20/70	12 00
04/29/70	7 00
06/29/70	5 00

Down Payment

Received on account:

from	to	34 00
12/02/69	06/29/70	

Grand Total		\$299 92
-------------	--	----------

34 00

\$299 92

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,274

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Alonzo O'Bannon & Virginia O'Bannon, jointly & individually

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.....

Alonzo O'Bannon & Virginia O'Bannon, jointly & individually

Defendant.....

by Field Enterprises Educational Corporation

..... Plaintiff.....

witness my hand this 9th day of March 19 72

Emmie B. Blackburn Clerk

No. 10,274

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

FIELD ENTERPRISES EDUCATIONAL CORPORATION

Plaintiffs

VS.

ALONZO O'BANNON & VIRGINIA O'BANNON
Jointly & individually Defendants

SUMMONS AND COMPLAINT

Filed March 9, 1972

Eunice B. Blackmon Clerk

FILED

MAR 9 1972

EUNICE B. BLACKMON CIRCUIT CLERK

William L. Howell

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 9 1971
Taylor Webb Sheriff
I have executed this summons

this March 10 1972
by leaving a copy with

Alonzo O'Bannon
Virginia O'Bannon

Sheriff's Office

Non Contempt

W. A. Zeller

BY Taylor Webb Sheriff
W. A. Zeller Deputy Sheriff

WILLIAM L. HOWELL

Attorney at Law

SUITE 2204
FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA 36602

March 8, 1972

TELEPHONE
AREA CODE 205
438-2516

Clerk of Circuit Court
Baldwin County Court House
Bay Minette, Alabama

10,274

Re: Field Enterprises Educational Corporation vs Arabell Roper
Field Enterprises Educational Corporation vs Alonzo O'Bannon
and Virginia O'Bannon
Alden's vs Arma L. Porter

Dear Sir:

Please advise me at your earliest convenience as to the case numbers and the date of service of process on the above defendants.

Thanking you in advance for your cooperation in the matter.

Very truly yours,


William L. Howell

WLH:gd

FIELD ENTERPRISES EDUCATIONAL
CORPORATION,

Plaintiff

-VS-

ALONZO O'BANNON and
VIRGINIA O'BANNON,
Jointly and individually,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,274

DEMURRER

Come now the defendants in above-styled cause, jointly and individually, by their attorney of record, and demur to the complaint heretofore filed in this cause and assigns as grounds therefor the following jointly and individually to each and every count thereof:

1. The complaint is vague.
2. The complaint is uncertain.
3. The complaint fails to allege whether any payments were ever paid on the account by the defendants.


ATTORNEY FOR DEFENDANTS

CERTIFICATE OF MAILING

I certify that I have mailed a copy of the foregoing Demurrer to Honorable William L. Howell, First Floor - Congress at Conception, 160 Congress, Mobile, Alabama 36600, by depositing the same in the United States Mail, postage prepaid, at Bay Minette, Alabama, on this sixteenth day of March, 1972.


ATTORNEY FOR DEFENDANTS

FILED

MAR 16 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA

Baldwin County

TO ALONZO O'BANNON Defendant.....:

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

FIELD ENTERPRISES EDUCATIONAL CORP. Plaintiff.....

versus ALONZO O'BANNON Defendant.....

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

Standard Furniture Mfg. Co.- Bay Minette, Alabama

has been named as Garnishee.....

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

6th day of October, 1972.


Clerk of the Circuit Court.

Sheriff claims _____ miles in

Ten Cents per mile Total \$ _____

TAYLOR WILKINS, Sheriff

BY _____ DEPUTY SHERIFF

Received _____ day of _____ 1972
and on 10 day of Oct 1972
I served a copy of the within Notice
on Alonzo O'Bannon

By service on _____

TAYLOR WILKINS, Sheriff
By W. O. Gallant D. S.

10,274 ½

NOTICE
TO DEFENDANT OF GARNISHMENT
BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
TO

ALONZO O'BANNON

FIELD ENTERPRISES EDUCATIONAL CORP.

Plaintiff....

VS.

ALONZO O'BANNON

Defendant....

RECEIVED

OCT 9 1972

TAYLOR WILKINS
SHERIFF

**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

10,274 1/2

THE STATE OF ALABAMA
MOBILE COUNTY
BALDWIN

CIRCUIT COURT

Notary Public

Personally appeared before me, ~~John P. Blackmon, Clerk of the Circuit Court~~ in and for Mobile County and State aforesaid William L. Howell

who being duly sworn, on oath says, that on the 13 day of June, 19 72
in the Circuit Court of Baldwin County, in Case No. 10,274 The Plaintiff
Field Enterprises Educational Corp.

recovered a judgment against Alonzo O'Bannon

the Defendant, whose address
is c/o Standard Furniture Mfg. Co., Bay Minette, Ala.

for the sum of TWO HUNDRED TWENTY and 42/100 (\$220.42) Balance on Judgment

Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;
that Standard Furniture Mfg. Co.

whose address is Bay Minette, Ala.

is supposed to be indebted to or have effects of the said Alonzo O'Bannon

in its possession or under its

control, and that he believes process of Garnishment against the said

Standard Furniture Mfg. Co., Bay Minette, Ala.

is necessary to obtain satisfaction of said Judgment.

[Signature]

Sworn to and subscribed this 3rd
day of October A.D., 1972

[Signature]
Notary Public X Clerk

My Commission Expires Jan. 14, 1974

FILED

OCT 6 1972

EUNICE B. BLACKMON CIRCUIT CLERK

No.....

CIRCUIT COURT

Field Enterprises Educational
Corporation

vs.

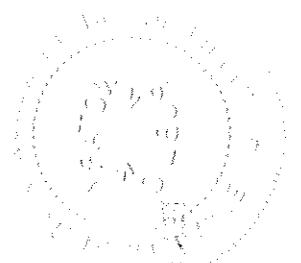
Alonzo O'Bannon
c/o Standard Furniture Mfg. Co.
Bay Minette, Alabama

**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

Filed in Office,

.....19.....

.....
Clerk.
.....



AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

CC Low 12-2M-12/71 APOA

THE STATE OF ALABAMA }
MOBILE COUNTY
BALDWIN

CIRCUIT COURT

Notary Public

Personally appeared before me, ~~XXXXXX~~ in and for Mobile County
and State aforesaid William L. Howell

who being duly sworn, on oath says, that on the 13 day of June, 1972
in the Circuit Court of Baldwin County, in Case No. 10,274 The Plaintiff
Field Enterprises Educational Corp.

recovered a judgment against Alonzo O'Bannon

the Defendant, whose address
is c/o Standard Furniture Mfg. Co., Bay Minette, Ala.

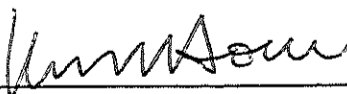
for the sum of TWO HUNDRED TWENTY and 42/100 (\$220.42) Balance on Judgment
Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;
that Standard Furniture Mfg. Co.

whose address is Bay Minette, Ala.

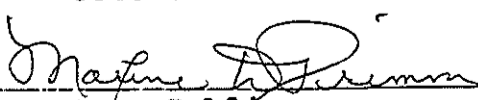
is supposed to be indebted to or have effects of the said Alonzo O'Bannon

in its possession or under its
control, and that he believes process of Garnishment against the said
Standard Furniture Mfg. Co., Bay Minette, Ala.

is necessary to obtain satisfaction of said Judgment.



Sworn to and subscribed this 3rd
day of October A.D., 1972


Notary Public
My Commission Expires 10-10-1974



No.....

CIRCUIT COURT

.....

Field Enterprises Educational
Corporation

vs.

Alonzo O'Bannon
c/o Standard Furniture Mfg. Co.
Bay Minette, Alabama

.....

**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

.....

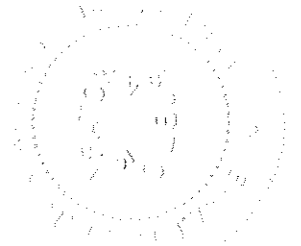
Filed in Office,

.....19.....

.....

Clerk.

.....



THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

JUNE

TERM, 19⁷²

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... June Term, 19⁷²..... of the Circuit Court of Baldwin County, to-wit: On the 13th day of June 19⁷²....., being a regular day of said term, Field Enterprises Educational Corp.

recovered judgment against Alonzo O'Bannon

for the sum of (\$220.42) Two Hundred Twenty & 42/100----- Dollars, and cost of suit, and affidavit having been made by William L. Howell that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

..... Standard Furniture Mfg. Co. - Bay Minette, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Alonzo O'Bannon or that is, or is believed to be indebted to said defendant or to be liable to them, or to one of them on a contract for the delivery of personal property, 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 Standard Furniture Mfg. Co.

to file an answer in duplicate to the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, within 30 days from 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 Alonzo O'Bannon and whether it will not be indebted in future to said defendant Alonzo O'Bannon 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, Alonzo O'Bannon

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

Eunice B. Blackmon 6th October 72
Witness, Clerk of said Court, this day of A. D., 19.....

Issued 6th October 72
..... day of A. D., 19.....

ATTEST:

..... Eunice B. Blackmon Clerk

RECEIVED
9 day of Sept 1972
and on 10 day of Oct 1972
delivered to W. L. Howell
on Standard Guar. Mfg.
By James Thompson
BY SERVICE ON
TAYLOR WILKINS Sheriff
BY W. L. Howell D.S.
0

Sheriff claims
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY
DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 10,274 1/2

FIELD ENTERPRISES EDUCATIONAL CORP.

VS. } GARNISHMENT ON JUDGMENT

ALONZO O'BANNON

Issued 6th day of Oct. 19 72

Returnable day of 19

RECEIVED

OCT 9 1972

TAYLOR WILKINS

SHERIFF

WILLIAM L. HOWELL

Attorney

WILLIAM L. HOWELL

Attorney at Law

SUITE 2204
FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA 36602

October 23, 1972

TELEPHONE
AREA CODE 205
438-2516

Standard Furniture Company
Highway 31, South
Bayminette, Alabama

Re: Field Enterprises Educational Corp vs Alonzo O'Bannon
Baldwin County Case No. 10,274 1/2

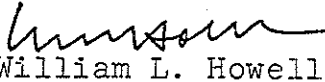
Gentlemen:

This is to advise that I have made an agreement with your employee's attorney to have payments made by your employee direct to my office in lieu of your withholding under the garnishment.

Please do not withhold under the garnishment, until such time as I advise.

Thanking you for your cooperation, I am,

Very truly yours,


William L. Howell

WLH:mp

cc: Honorable Kenneth Cooper
Attorney at Law
109 East 1st Street
Bay Minette, Alabama 36507

WILLIAM L. HOWELL

Attorney at Law

October 23, 1972

SUITE 2204
FIRST NATIONAL BANK BLDG.
MOBILE, ALABAMA 36602

TELEPHONE
AREA CODE 205
438-2516

Ms. Eunice Blackmon
Clerk, Circuit Court of Baldwin County
Bay Minette, Alabama 36507

Re: Garnishment, Case No. 10,274 1/2, Field Enterprises
vs Alonzo O'Bannon

Dear Ms. Blackmon:

Please have the above garnishment continued as I have an agreement with the debtor's attorney to pay to my office in lieu of withholding under the garnishment.

Thanking you and with warmest regards, I am,

Very truly yours,


William L. Howell

WLH:mp

cc: Honorable Kenneth Cooper
Attorney at Law
109 East 1st Street
Bay Minette, Alabama 36507

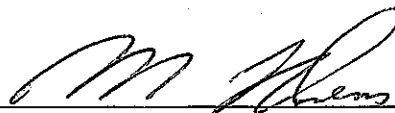
SWORN STATEMENT OF CLAIM

STATE OF ILLINOIS
COUNTY OF COOK

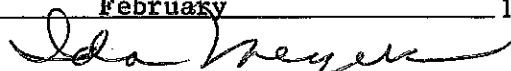
Debtor: Virginia O'Bannon & Alonzo O'Bannon

A/C No.: 1170-174355

M. L. OWENS, being duly sworn, deposes and says that he is Collection Manager for FIELD ENTERPRISES EDUCATIONAL CORPORATION, a Delaware Corporation with its principal office in the City of Chicago, Illinois. Deponent further says he is familiar with the facts and records pertaining to the above described account and that the attached statement correctly sets forth the said debtor's indebtedness to said corporation in the amount of \$ 265.92 together with interest, exclusive of counterclaims, offsets, and just grounds of defense, and besides costs.



Subscribed and sworn before me this 9th day of February 1972.



My Commission Expires April 21, 1974

Notary Public, Cook County, Illinois