

AMENDED COMPLAINT

THE STATE OF ALABAMA }
MOBILE COUNTY
BALDWIN

CIRCUIT COURT

Notary Public

Personally appeared before me, ~~John E. McQuitery, 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 ²¹~~25th~~ day of July, 19 72
Baldwin

in the Circuit Court of ~~Mobile~~ County, in Case No. 10,449 The Plaintiff

Merchants Adjustment Service, Inc.

recovered a judgment against Richard McQuitery

the Defendant, whose address

is c/o Lake Forest Yacht and Country Club, Inc., a Ala. corp. Hwy 90
Daphne, Ala.

for the sum of FOUR HUNDRED SEVENTY-THREE and 34/100 (\$473.34) Balance on Judgment

Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;

that Lake Forest Yacht and Country Club, A Ala. corp.

whose address is Hwy. 90, Daphne, Ala.

is supposed to be indebted to or have effects of the said Richard McQuitery

in its possession or under its

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

Country Club, a Ala. Corp., Hwy 90, Daphne, Ala.

is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 2

day of October A.D., 19 72

Notary Public

My Commission Expires Jan. 23, 1975

Check

FILED

OCT 6

EUNICE B. BLACKMON CIRCUIT CLERK

AMENDED COMPLAINT

No.....

CIRCUIT COURT

Merchants Adjustment Service,
Inc.

vs.

Richard McQuitery
Lake Forest Yacht and Country
Club, A. Alabama Corp.
Hwy 90
Daphne, Ala.

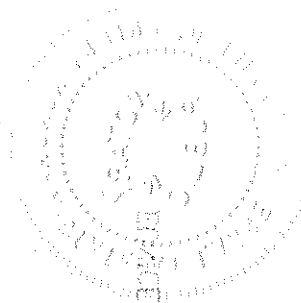
**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

Filed in Office,

19.....

Clerk.

FILED



MERCHANTS ADJUSTMENT
SERVICE, INC.,

Plaintiff,

vs.

RICHARD McQUITERY,

Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

)

)

)

CASE NO. 10,449 1/2 *A*

ANSWER

Comes now Lake Forest Yacht and Country Club, Inc. (Lake Forest) and in answer to the Garnishment on Judgment issued in the above styled cause avers as follows:

1. Lake Forest was served with the Garnishment on September 7, 1972.

2. Richard McQuitery was at that date employed by Lake Forest and continues to be so employed.

3. In connection with such employment Lake Forest was indebted to Richard McQuitery on September 7, 1972, has thereafter incurred further indebtedness to Richard McQuitery and expects to incur still further indebtedness to him in the future.

4. Lake Forest's indebtedness to Richard McQuitery was \$144.38 of disposable income for the pay period which ended on September 9, 1972. Lake Forest's further indebtedness to Richard McQuitery has accrued, and will accrue, at the rate of TWO DOLLARS (\$2.00) of gross income per hour.

5. Lake Forest holds no property belonging to and owes no debt to Richard McQuitery other than as described hereinabove.

LAKE FOREST YACHT & COUNTRY CLUB, INC.

By *William E. Morley*

FILED

OCT 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Personally appeared before me the undersigned authority in and for said county in said state, WILLIAM E. MOSELEY, who being by me first duly sworn did depose and say:

I am the Assistant Treasurer of Lake Forest Yacht and Country Club, Inc., and am an authorized agent of said corporation to make this answer. I am informed and believe and based upon such information and belief, state that the foregoing answer to the Garnishment on Judgment is true and correct.

William E. Moseley
WILLIAM E. MOSELEY

SWORN and SUBSCRIBED to
Before me this 5th day of
October, 1972.

G. V. Parker
Notary Public

FILED

OCT 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA

Baldwin County

TO RICHARD McQUITERY, Defendant.....:

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

MERCHANTS ADJUSTMENT SERVICE, INC. Plaintiff.....

versus RICHARD McQUITERY, Defendant.....,

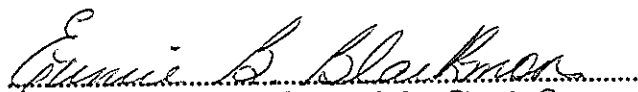
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

LAKE FOREST YACHT & COUNTRY CLUB, A ALA. CORP.

has^s been named as Garnishee.....

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

6th day of Oct. 19 72


Clerk of the Circuit Court.

15-10

10,449 1/2

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

RICHARD McQUITERY

MERCHANT'S ADJUSTMENT SERVICE, INC.,
Plaintiff....

VS.

RICHARD McQUITERY

RECEIVED Defendant....

OCT 5 1972

TAYLOR WILKINS
SHERIFF

Received 9 day of Oct. 1972
and on 20 day of Oct. 1972
I send a copy of the within
to Richard M. Quitery
in service of T. Mc Quitery

TAYLOR WILKINS, Sheriff
By: Cook D. B.

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