B 23-5M-2-73

X SOUTH A WASHING WAY AND A SECTION OF THE SECTION

### 

To the Sheriff of Model County—Greetings:

YOU ARE COMMANDED TO SUMMON	South Baldwin Bank	, Garnishee,
Circuit to be and appear before the Court xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	Baldwin  Rights of Markity County, at the Courtho	Baldwin ouse of XXXXXCounty,
within 30 days from service:		
as Garnishee, in what amount, if any,it wa	s indebted to <u>Joe R. Garri</u> s	s, Sr.
	Defendant, at the time of the service	of this Writ of Garnish-
ment, or at the time of making said answer theret	to, or at any time intervening the serv	ice of this Writ of Gar-
nishment and making the said answer, and whether	er <u>it</u> will be indebted in the futu	are to said defendant by
a contract existing at the time of the serving of thi	is Writ of Garnishment, or at the tir	ne of making the said
answer, and whether it has in its possession		and the second of the second o
things in action belonging to said defendant.		
Witness my hand this day of	19.74.	
	Clerk of the Court MXXXXXXXXXXXXX	SERSICE THE SHOW WITH THE SHOW

Attorney for Plaintiff: Thomas M. Galloway, COLLINS, GALLOWAY & MURPHY P.O. Box 4492 - 958 Dauphin St. Mobile, Alabama 36604

	-	
UG 2 0 19 (LOR WILK SHERIFF	the return date shown on this writ of garnishment, which written statement must contain this writ of garnishment.	you to file in the office of the Clerk of this Court a written statement, sworn to by you before a
	n on	e of t
ī	this	the C
	writ	lerk
	of.	of th
	garni	nis C
	íshme	ourt :
· 27	nt, 1	a wri
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1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ntain	bef
	the	ore :
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TO THE GARNISHEE: If you prefer not to appear in Court on the day and hour stated in this writ, the law permits

Notary Public, before

the return date shown on this writ of garnishment, which written statement must contain the information called for TAYLOR WILKI

No 10,491/2	
Ret, 197	: : :
Alabama Farm Bureau Mutual	Ž
Casualty Insurance Company Plaintiff	
<b>vs.</b>	The state of the s
Joe R. Garris, Sr.	
	1 1 1 1
Defendant	
South Baldwin Bank	Š
943-2731	1
Garnishee	W
Claim	6
Cost \$	· · · · · · · · · · · · · · · · · · ·
Total \$	30
	8
ZXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	76

AUG 2 0 1974 this strict of garnishment. South Charge. \*ithir 2 1-10ay of TAYES i served a copy of the By sorvice on Received. and on.

B 23-5M-2-73

# THE STATE OF ALABAMA COUNTY OF MIXEXIER BALDWIN

To the Sheriff of MXXXX County—Greetings:

YOU ARE COMMANDED TO SUMMON farmers and merchants Bank, Garnishee,
Circuit Baldwin Baldwin
to be and appear before the Court of XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
within 30 days from service here of a service answer on oath in writing,
on the day of
as Garnishee, in what amount, if any, <u>it</u> was indebted to <u>Joe R. Garris, Sr.</u>
ment, or at the time of making said answer thereto, or at any time intervening the service of this Writ of Gar-
nishment and making the said answer, and whether <u>it</u> will be indebted in the future to said defendant by
a contract existing at the time of the serving of this Writ of Garnishment, or at the time of making the said
answer, and whether it has in its possession, or under its control any personal or real property or
answer, and whether has in possession, or under condor any personal or rear property or
things in action belonging to said defendant.
Witness my hand this 19 day of 1924
Guine BRIDE
Clerk of the Court XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

## RECLIVED

NOTICE TO GARNISHEE  Attorney for Plaintiff: Thomas M. Galloway, Jr. COLLINS, GALLOWAY & MURPHY P.O. Box 4492 - 958 Dauphin St. Mobile, Alabama 36604 No10,491/2	Z.	AUG 2 0 1974 FAYLOR WILKINS SHERIFF	TO THE GARNISHEE: If y you to file in the office of the return date shown on in this writ of garnishment
Ret, 197  Alabama Farm Bureau Mutual Casu	alty	Adoresista Selection of the selection of	If you prefer not of the Clerk of to on this writ of ment.
VS.  Joe R. Garris, Sr.  P.O. Box 5/6 6. Shee  Defendant	Sharift clative		Court ritten : which
Farmers and Merchants Bank  943-2641  Garnishee	AH C	1 2 1	on the day and statement, sworn written stateme
Claim		arth for	hour st to by y int must
Total \$	Hey wis	The state of the s	this the
	23 day of	TAYLOR)	_್ಚಿ
**************************************	Received and served a copy	By service on	before led for

B 23-5M-2-73

To the Sheriff of Manie County-Greetings:

YOU ARE COMMANDED TO SUMMON _ State Bank of the Gulf	, Garnishee,
Circuit Baldwin	Baldwin
to be and appear before the Court of Seneral Services of Wall County, at the Cou	irthouse of XXXXXCounty,
with 3 31 days 200m services horo A	•
within 30 days from service here of the hours of 0.00 AM, or	answer on oath in writing.
	<b>3</b> ,
as Garnishee, in what amount, if any, <u>it</u> was indebted to <u>Joe R.</u>	Garris, Sr.
, Defendant, at the time of the serv	ice of this Writ of Garnish-
,	
ment, or at the time of making said answer thereto, or at any time intervening the	service of this Writ of Gar-
f(x) = f(x) . The first $f(x) = f(x)$ is the first $f(x) = f(x)$ . The first $f(x) = f(x)$	
nishment and making the said answer, and whether <u>it</u> will be indebted in the	future to said defendant by
	·
a contract existing at the time of the serving of this Writ of Garnishment, or at the	time of making the said
answer, and whether <u>it</u> has mits possession, or under its control any p	ersonal or real property or
things in action belonging to said defendant.	
Witness my hand this / day of 1924	
Colinial S	5/nekme
Clerk of the Court XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	X XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

Attorney for Plaintiff:

Thomas M. Galloway, Jr. COLLINS, GALLOWAY & MURPHY P.O. Box 4492 - 958 Dauphin St. Mobile, Alabama 36604

No. 10,491/2

Ret.	197
Alabama Farm Burea	u Mutual
Casualty Insurance	Compan y Plaintiff
vs.	
Joe R. Garris, Sr.	

Defendant

Garnishee

	•			- 1	1
State	Bank	of	the	Gul	. <b>f</b>
					70 A

Claim . . . . \$\_1.,0.75\_56

Total.

RKQHKAR XKKKKKKK NOXRKKON XKKKKONXKNHOKKAO

## RECLIVED

AUG 2 0 1974

TAYLOR WILKINS
SHERIFF

BUSEU STORY

in this writ of garnishment the return date shown on this writ of garnishment, of the Clerk of this Court a written statement, sworn to by you before a Notary Public, before which written statement must contain the information called for

## IN THE CIRCUIT COURT OF BALDWIN COUNTY XXXXCOUNTXOFX GENERAL Sessions of Machilex County

THE STATE OF ALABAMA,	NOTICE T	O DEFENDANT	
Baldwin  ALABAMA FARM BUREAU MUTUAL  INSURANCE COMPANY  JOE R. GARRIS, SR	L_CASUALTY Plaintiff  fendant	Costs of Garnishment -	\$ \$
FARMERS AND MERCHANTS BANK	} "	Garnishees.	e de desente de sema faço e desente de sema faço e desente de sema faço e de desente de sema faço e de desente
Take notice th	nat I have this da	ay issued a Writ of Garnis	hment, summoning
FARMERS_AND  Circuit to appear before the/Court of XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	MERCHANTS DE MERCH	BANK  Baldwin within County, on the day o	- 30 days from
19 at 9:00 A. M., to answer an oath	n as Garnishee, w	The state of the s	to you or not.

Clerk of The Court of Kananai Xanana Xixana Xixana

### RECLIVED

Attorney for Plaintiff: Thomas M. Galloway, Jr. COLLINS, GALLOWAY & MURPHY P.O. Box 4492 - 958 Dauphin St. Mobile, Alabama 36604

Case No. \_\_\_\_\_\_\_10,491/2

AUG 2 0 1974
TAYLOR WILKINS
SHERIFF

### NOTICE TO DEFENDANT

Alabama Farm Bureau Mutual Casualty
Insurance Company Plaintiff
VS.

Joe R. Garris, Sr.

Defendant

P.D. Box 516 Cour SHORES : 19

Garnishees

 Judgment
 \$1,075.56

 Cost
 \$

Garnishment \$

COURTXOR SENERALX SESSIONS

OR MOBILEX COUNTRY

# IN THE CIRCUIT COURT OF BALDWIN COUNTY

THE STATE OF ALABAMA, MAXXIX County } Baldwin	NOTICE	E TO DEFENDANT	
		Judgment \$	1.075.56
ALABAMA FARM BUREAU MU INSURANCE COMPANY  JOE R. GARRIS, SR.	TUAL CASUALTY Plaintiff	Interest \$  Costs of Judgment \$  Costs of Garnishment - \$	
	Defendant	Total \$	
A Company of the Comp			
SOUTH BALDWIN BANK		Garnishees.	
Take noti	ce that I have this	day issued a Writ of Garnishment	
	JTH BALDWIN BA		, summoning
Circuit to appear before the/Court MKEXNEY	BALDWI XXXXXX of MXXXXXX	N County on the	
19 at 9:00 A. M., to answer an	oath as Garnishee. v	whether they were indebted to you	ı or not.
Given under my	hand this 19 day	y of Aug-, 1	974.
	Cle	rk of The Court MIXIX NEW XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	KKXXXK

Attorney for Plaintiff: Thomas M. Galloway, Jr. COLLINS, GALLOWAY & MURPHY P.O. Box 4492-958 Dauphin St. Mobile, Alabama 36604

Case No. \_\_\_\_\_\_ 10,491/2\_

RECEIVED

AUG 2 0 1974 TAYLOR WILKINS

SHERIFF

### NOTICE TO DEFENDANT

Alabama Farm Bureau Mutual Casualty Insurance Company Plaintiff VS.

Joe	R.	Garris	į	$\operatorname{\mathtt{Sr}}$	
			<u> </u>		 

Defendant

South Baldwin Bank

Doct 516 Gulf Holts Ar

Garmishees

 Judgment
 \$ 1,075.56

 Cost
 \$

 Garnishment
 \$

XOURK XOKAMENAK XK XXIOMS XOKAMODIKK XOUNKK

# IN THE CIRCUIT COURT OF BALDWIN COUNTY The Court of General Sessions of Mobile County

THE STATE OF ALABAMA,	NOTICE TO DEFENDANT
Baldwin	Judgment \$1,075.56
Alabama Farm Bureau Mutual Casu Insurance Company Plaintiff  Joe R. Garris, Sr.  Defendant	Costs of Garnishment - \$
State Bank of the Gulf	Garnishees.
Take notice that I State Bank Of	have this day issued a Writ of Garnishment, summoning
Circuit Ba	aldwin XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
at 9:00 A.M., to answer an oath as	Garnishee whether they were indebted to you or not.  is // day of

Attorney for Plaintiff:
Thomas M. Galloway, Jr.
COLLINS, GALLOWAY & MURPHY
P.O. Box 4492 - 958 Dauphin St.
Mobile, Alabama 36604
Case No. 10,491/41

### NOTICE TO DEFENDANT

Alabama Farm Bureau Mutual Casualty Insurance Co. Plaintiff

VS.

Joe R. Garris, Sr.

Defendant

State Bank of the Gulf

P.D. Box 516 Gulf Sports

Judgment \$1,075.56

Cost

Garnishment \$

RECLIVED

AUG 20 1974

TAYLOR WILKINS SHERIFF.

Tom Cents per mile Lotal & Williams at Towns of Michael Sharter

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service on...

### GARNISHMENT AFFIDAVIT

10,491/2

THE STATE OF ALABAMA MORKE COUNTY	}			/ - /	
BALDWIN  Before me, the u	ndersigned, Clerk (	Circuit of The/Court of XXX			
personally appeared	Thoma	as M. Galloway,	Jr.	_who made	oath in
due form of law that	Alabama Fari	m Bureau Mutual	Casualty	Ins. Co	<u>'-</u> hath
obtained judgment against	Joe R. Garr	is, Sr.			
forONE THOUSAND SEV besides cost of suit before The Merchants Bank, Fole	Cìrcuit	Baldwin			
and State Bank of the					ndebted
		•			
Garnishment is necessary again	st the said Farme	ers & Merchants	Bank, So	uth Bald	lwin
Bank and State Bank to obtain satisfaction ofsai		COLLINS - GALL			974   N CIRCUIU

\_15 taby of

Subscribed and sworn to before me, the

BY:

Thomas M. Galloway,

Notary Public, Mobile County, Alabama

August

EUNICE B. BLACKMON CIRCUIT

ATTORNEY FOR PLAINTIFF	
No. 10,491/2	
RET.	
Alabama Farm Bureau Mutual Casu Insurance Company Plaintiff  VS.   GARNISHMENT	alty
Joe R. Garris, Sr.  Defendant	
Executed by Service on	•
Defendant Notice of Garnishment,	
This19	
Sheriff Mobile County	
By Deputy Sheriff	
Executed by Service on	
	:
Garnishee Thisday of19	
Sheriff Mobile County	
By Deputy Sheriff	

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

### COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

955 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924 - 1956)
ROBERT H. SMITH
WILSON M. HAWKINS, JR.
THOMAS M. GALLOWAY, JR.

August 15, 1974

P. O. BOX 4492 TELEPHONE 432-0568 AREA CODE 205

Mrs. Eunice B. Blackmon Clerk, Circuit Court Baldwin County Court House Bay Minette, Alabama

> Re: Alabama Farm Bureau Vs: Joe R. Garris, Sr. Case No. 10,491

Dear Mrs. Blackmon:

Enclosed herewith is a garnishment in the above referenced matter. Please file the same and proceed to garnishment on the defendant's wages. If I need to do any thing further please advise.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:

Thomas M.

Galloway / Jr

TMGJr/jkl Enclosure

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1275.56 133 1275.56 133 125.378 21.572

7 3 4 3

### COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

955 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924 - 1956)
ROBERT H. SMITH
WILSON M. HAWKINS, JR.
THOMAS M. GALLOWAY, JR.

August 26, 1974

P. O. BOX 4492 TELEPHONE 432-0568 AREA CODE 205

Mrs. Eunice B. Blackmon Clerk, Circuit Court Baldwin County Court House Bay Minette, Alabama

> Re: Alabama Farm Bureau Vs: Joe R. Garris, Sr. Case No. 10,491

Dear Mrs. Blackmon:

Enclosed herewith is amended garnishment in the above referenced matter.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

RA:

Thomas M. Galloway / Jr

TMGJr/fs Encls:

#### STATE BANK OF THE GULF

P. O. BOX 237

GULF SHORES, ALABAMA 36542

August 23, 1974

Honorable Eunice Blackmon Clerk of the Court Baldwin County Bay Minette, Alabama

Re: Case No. 10,491½
Alabama Farm Bureau Mutual
Casualty Insurance Company

Joe R. Garris, Sr.

Dear Mrs. Blackmon:

Enclosed is an affidavit in answer to your summons to State Bank of the Gulf dated August 19, 1974, re Joe R. Garris, Sr. This affidavit contains the information called for in this writ of garnishment.

Very truly yours,

Andrew J. Cooper

President

AJC/mac

cc: Mr. Thomas M. Galloway, Jr. Collins, Galloway & Murphy

P. O. Box 4492 - 958 Dauphin Street

Mobile, Alabama 36604

### **AFFIDAVIT**

STATE OF ALABAMA ) BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Andrew J. Cooper, who is known to me, and being first duly and legally sworn, deposes and says:

- State Bank of the Gulf is not indebted to Joe R. Garris, Sr., Defendant, at the time of the service of this Writ of Garnishment, or at the time of making said answer thereto, or at any time intervening the service of this Writ of Garnishment and making the said answer.
- State Bank of the Gulf will not be indebted in the future to Joe R. Garris, Sr., Defendant, by a contract existing at the time of the serving of the Writ of Garnishment, or at the time of making the said answer.
- State Bank of the Gulf does not have in its possession, or under its control any personal or real property or things in action belonging to said Joe R. Garris, Sr., Defendant.

STATE BANK OF THE GULF

SWORN to and subscribed before me this 30 to day of August, 1974.

SEP 4 1974

LUNICE B. BLACKMON CLERK

### IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

ALABAMA FARM BUREAU MUTUAL CASUALTY INSURANCE COMPANY, A Corporation,

AT LAW

Plaintiff,

VS:

CASE NO. 10,491

JOE R. GARRIS, SR.,

Defendant.

:

### AMENDED GARNISHMENT

Comes now Thomas M. Galloway, Jr., and amends in part his garnishment affidavit as heretofore filed in this cause to state that a judgment against Joe R. Garris, Sr., was obtained in the amount of ONE THOUSAND SEVENTY FIVE AND 56/100 (\$1,075.56) DOLLARS plus interest from April 20, 1974 beside the cost of suit. The interest stated above amounts to TWO HUNDRED FIFTEEN AND 11/100 (\$215.11) DOLLARS. This would bring the total judgment to ONE THOUSAND TWO HUNDRED NINETY AND 67/100 (\$1,290.67) DOLLARS besides the cost of suit.

COLLINS, GALLOWAY & MURPHY

By:

THOMAS M. GALLOWAY, JR.V

Sworn to and subscribed before me on this the 26th day of August, 1974.

Notary Public, Mobile County, Alabama

### CERTIFICATE OF SERVICE

I do hereby certify that I have on this 26th day of August, 1974, served a copy of the foregoing amended garnishment on Mr. Charles Kohler, South Baldwin Bank, Gulf Shores, Alabama, by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

Thomas M. Galloway

AU6 27 19/4

CHASON & UNDERWOO
-------------------

Attorneys at Law \_

CECIL G. CHASON THOMAS W. UNDERWOOD, JR.

August 26, 1974

P. O. DRAWER 458 216 W. LAUREL AVENUE FOLEY, ALABAMA 36535 PHONE 205 / 943-3171

Ms. Eunice B. Blackmon Clerk of Court Baldwin County Courthouse Bay Minette, Alabama

> Re: Alabama Farm Bureau Mutual Casualty Insurance Company vs. Joe R. Garris, Sr.

Garnishee: Farmers & Merchants Bank, Case No. 10,491½

Dear Ms. Blackmon:

I am enclosing Answer of Garnishee in the above styled cause. Please file.

Sincerely yours,

Jam

T. W. Underwood, Jr.

TWUjr/jc

Enc.

cc/enc: Mr. Thomas M. Galloway, Jr.

The Law Law Law

AUG 27 1974

EUNICE B. BLACKMON CIRCUIT CLERK

STATE OF ALABAMA

BALDWIN COUNTY

### ANSWER OF GARNISHEE

Before me, the undersigned, personally appeared GEORGE HOLMAN, Assistant Vice President of Farmers and Merchants Bank, Foley, Alabama, who is known to me and who, being by me first duly and legally sworn, deposes and says: That the Farmers and Merchants Bank, Foley, Alabama, at the time of the service of the writ of garnishment in Case No. 10, 491 in which Alabama Farm Bureau Mutual Casualty Insurance Company is the Plaintiff and Joe R. Garris, Sr., is the Defendant, at the time of making this answer, nor any time intervening the service of the writ of garnishment and the making of this answer was not indebted in any manner to said Defendant, nor will the Farmers and Merchants Bank be indebted in the future as a result of any contract between the garnishee and the Defendant, since there is no contract in existance and the garnishee further answers the writ of garnishment stating that the garnishee does not have in its possession or under its control any personal or real property or things in action belonging to the Defendant.

> Spores Holman George Holman

Sworn to and subscribed before me on this 210 th day of August 1974.

Notary Public, Baldwin County
State of Alabama

TILED

AUG 2 7 1974

EUNICE B. BLACKMON CIRCUIT

CERTIFICATE OF SERVICE

day of August, 1974, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Thomasi). Underword ...

RELEASE OF GARNISHMENT			
CIRCUIT Court of BALDWIN	_County, Alabama		
RE: ALABAMA FARM BUREAU MUTUAL CASUALTY INS., CO.			
vs.	Plaintiff.		
JOE R. GARRIS, SR.			
	Defendant.		
To: SOUTH BALDWIN BANK			
	GARNISHEE		
I, Eunice B. Blackmon, Clerk of the Circuit Court of	: Baldwin County Ala-		
bama, do hereby certify that in the above styled case, Garnishment has			
been discharged.			
Witness my hand, this the 12th day of September	, 19 <u>74</u>		
Lounice S	J. Glackman CLERK.		





September 6, 1974

Mr. Norborne C. Stone, Jr. Chason, Stone and Chason, Attorneys Bay Minette, Alabama 36507

Dear Mr. Stone:

At the request of Joe R. Garris, Sr., we enclose Registered Check No. 74708 in the amount of \$1,199.96 payable to Eunice B. Blackmon, Clerk of the Court, showing payment in full of Sheriff's Garnishment and Amendment against Joe R. Garris, Sr.

We understand that you will furnish us with the proper documents showing a release of this garnishment when this check is delivered to Mrs. Blackmon.

Sincerely yours,

Charles G. Koehler, Jr.

Cashier

CGKjr/js

Enclosure

Ton Galloway, Jr.

### COLLINS, GALLOWAY & SMITH

ATTORNEYS AT LAW

SUITE 525, BEL AIR OFFICE MALL II 3100 COTTAGE HILL ROAD MOBILE, ALABAMA 36606

FRED G. COLLINS
THOMAS M. GALLOWAY
ROBERT H. SMITH
THOMAS M. GALLOWAY, JR.

September 11, 1974 (Dictated September 10, 1974) M. THOMAS MURPHY (1924 - 1956)

TELEPHONE (205) 476-4493

Mrs. Eunice B. Blackmon Clerk, Circuit Court Baldwin County Court House Bay Minette, Alabama

> Re: Alabama Farm Bureau Vs: Joe R. Garris, Sr. Case No. 10,491

Dear Mrs. Blackmon:

This is to confirm our telephone conversation of this date in which I stated that we had agreed with the attorney for the defendant to waive the interest due on the judgment rendered in this case. Therefore the amount necessary to satisfy the judgment would be \$1,075.56 plus the costs of court.

Thank you very much for your help in this matter.

Very truly yours,

COLLINS, GALLOWAY & SMITH

By:

Thomas M. Galloway,

TMGJr/fs

EP 12,1974

EUNICE B. BLACKMON CIRCUIT

man the same transita