

|               |   |                         |
|---------------|---|-------------------------|
| ALDEN'S       | ) | IN THE CIRCUIT COURT OF |
|               | ) |                         |
| Plaintiff     | ) | BALDWIN COUNTY, ALABAMA |
|               | ) |                         |
| VS            | ) | AT LAW                  |
|               | ) |                         |
| DIANNE GRUBBS | ) |                         |
|               | ) |                         |
| Defendant     | ) | CASE NO. <u>10,569</u>  |

Plaintiff claims of the defendant TWO HUNDRED FORTY-SEVEN and 76/100 (247.76) DOLLARS due from him by account in June, 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  
 WILLIAM L. HOWELL  
 Attorney for Plaintiff  
 2204 First National Bank Bldg.  
 Mobile, Alabama 36602

Serve the defendant at:

Rt. 1, Box 156, Robertsdale, Ala. or South Baldwin Mills  
 Robertsdale, Ala.

STATE OF ALABAMA )  
 )  
 BALDWIN COUNTY )

TO ANY SHERIFF IN THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summons DIANNE GRUBBS, TO appear in the Circuit Court of Baldwin County, Alabama, within days from the service of this writ, at the place of holding the same then and there to answer the annexed complaint of ALDEN'S

Witness my hand as Clerk, this 25 day of August 1972.

Eunice B. Blackmon  
 CLERK

**FILED**

AUG 25 1972

EUNICE B. BLACKMON CIRCUIT CLERK

STATEMENT OF ACCOUNT

Creditor Alden's

Debtor Dianne Grubbs

Address Rt.1, Box 156 Robertsdale, Ala.

Employment South Baldwin Mills

Address Robertsdale, AL

Professional Services Rendered on Account \$           

Merchandise, Goods, Sold and Delivered on Acct \$ 247.76

Date of Last Charge 6/16/69

Date of Last Payment 12/69

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

x

Sol Levent  
Affiant Local Collector Mgr.

Sworn and subscribed to before  
me this 1, day of August  
1972.

Bernice S. S. S.  
NOTARY PUBLIC

My commission expires: Commission Expires  
April 5, 1976

10,569

B-107

Alden's

Pltf.

vs.

Dianne Drabbs  
Deft

FILED

AUG 25 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

RECEIVED

AUG 25 1972

TAYLOR WILKINS

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING \_\_\_\_\_ PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ \_\_\_\_\_  
PROCESS(ES) OR A TOTAL OF \$ \_\_\_\_\_

Received 25 day of Aug 1972  
and on 19 day of Sept 1972  
I served a copy of the within  
on Dianne Drabbs

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By H. H. Brown D. I.  
50 me RT R. Dale

WILLIAM L. HOWELL  
*Attorney at Law*

SUITE 2204  
FIRST NATIONAL BANK BLDG.  
MOBILE, ALABAMA 36602

October 24, 1972

TELEPHONE  
AREA CODE 205  
438-2516

Honorable Telfair Mashburn  
Judge of Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama

Re: Alden's vs Dianne Grubbs, Case No. 10,569

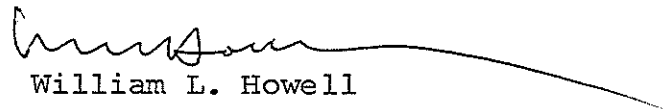
Dear Judge Mashburn:

Please enter a default judgment in the above styled matter  
in the sum of \$292.36. A breakdown of the computation of  
the judgment is as follows:

|                     |              |
|---------------------|--------------|
| Principal . . . . . | \$247.76     |
| Interest . . . . .  | <u>44.60</u> |
| Total               | \$292.36     |

Thanking you for your considerations in the matter, and with  
warmest regards, I am,

Very truly yours,

  
William L. Howell

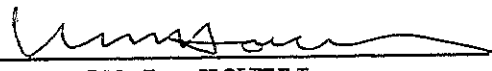
WLH:gd

|               |   |                         |
|---------------|---|-------------------------|
| ALDEN'S       | ) | IN THE CIRCUIT COURT OF |
|               | ) |                         |
| Plaintiff     | ) | BALDWIN COUNTY, ALABAMA |
|               | ) |                         |
| VS            | ) |                         |
|               | ) | AT LAW                  |
| DIANNE GRUBBS | ) |                         |
|               | ) |                         |
| Defendant     | ) | CASE NO. 10,569         |

MOTION FOR JUDGMENT BY DEFAULT

Comes now the plaintiff in the above styled cause and shows and represents unto Your Honor that the defendant in the above styled cause was served with process on September 19, 1972 and since that date had failed and refused to plea, answer or demur to the complaint, and still fails and refuses to plea, answer, or demur;

WHEREFORE, the plaintiff moves Your Honor to make and enter a judgment for the plaintiff in the sum of TWO HUNDRED NINETY-TWO and 36/100 (\$292.36) DOLLARS.


  
 WILLIAM L. HOWELL  
 Attorney for Plaintiff  
 2204 First National Bank Bldg.  
 Mobile, Alabama 36602

|               |   |                         |
|---------------|---|-------------------------|
| ALDEN'S       | ) | IN THE CIRCUIT COURT OF |
|               | ) |                         |
| Plaintiff     | ) | BALDWIN COUNTY, ALABAMA |
|               | ) |                         |
| VS            | ) |                         |
|               | ) | AT LAW                  |
| DIANNE GRUBBS | ) |                         |
|               | ) |                         |
| Defendant     | ) | CASE NO. 10,569         |

MOTION FOR JUDGMENT BY DEFAULT

Comes now the plaintiff in the above styled cause and shows and represents unto Your Honor that the defendant in the above styled cause was served with process on September 19, 1972 and since that date had failed and refused to plea, answer or demur to the complaint, and still fails and refuses to plea, answer, or demur;

WHEREFORE, the plaintiff moves Your Honor to make and enter a judgment for the plaintiff in the sum of TWO HUNDRED NINETY-TWO and 36/100 (\$292.36) DOLLARS.

  
 WILLIAM L. HOWELL  
 Attorney for Plaintiff  
 2204 First National Bank Bldg.  
 Mobile, Alabama 36602

WILLIAM L. HOWELL

*Attorney at Law*

October 24, 1972

SUITE 2204  
FIRST NATIONAL BANK BLDG.  
MOBILE, ALABAMA 36602

TELEPHONE  
AREA CODE 205  
438-2516

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

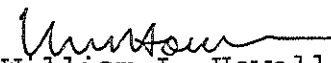
Re: Alden's vs Dianne Grubbs, Case No. 10,569

Dear Mrs. Blackmon:

Please forward the attached Motion for Judgment by Default in the above styled matter, along with the letter to His Honor with a breakdown of the computation.

Thanking you for your cooperation in the matter, and with warmest personal regards, I am,

Very truly yours,

  
William L. Howell

WLH:gd

WILLIAM L. HOWELL

*Attorney at Law*

SUITE 2204  
FIRST NATIONAL BANK BLDG.  
MOBILE, ALABAMA 36602

August 23, 1972

TELEPHONE  
AREA CODE 205  
438-2516

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

10,569

Re: Alden's vs Dianne Grubbs

Dear Mr. Blackmon:

Please advise me at your earliest convenience as to the case number the date of service of process on the above styled matter.

With warmest regards, I am,

Very truly yours,

  
William L. Howell

WLH:gd

Encl:



AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT

10,569 1/2

THE STATE OF ALABAMA }  
MOBILE COUNTY  
BALDWIN

## CIRCUIT COURT

Notary Public

Personally appeared before me, ~~John F. Maxwell, Clerk of the Circuit Court~~ in and for Mobile County  
and State aforesaid William L. Howellwho being duly sworn, on oath says, that on the 25 day of October, 1972  
in the Circuit Court of Baldwin County, in Case No. 10,569 The Plaintiff

Alden's

recovered a judgment against Dianne Grubbs

the Defendant, whose address  
is c/o South Baldwin Mills, Robertsdale, Ala.

for the sum of TWO HUNDRED NINETY-TWO and 36/100 (\$292.36)

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

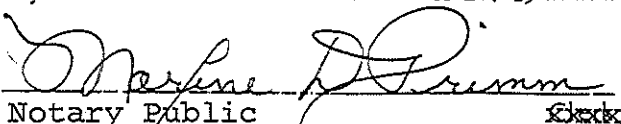
whose address is Robertsdale, Alabama

is supposed to be indebted to or have effects of the said Dianne Grubbs

in its possession or under its

control, and that he believes process of Garnishment against the said South Baldwin Mills  
Robertsdale, Ala.

is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 6th  
day of December A.D., 1972  
Notary Public Clerk

My Commission Expires Jan. 28, 1976

FILED

DEC 7 1972

EUNICE B. BLACKMON CIRCUIT CLERK

No.....

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**CIRCUIT COURT**

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.....

Alden's

vs.

Dianne Grubbs  
c/o South Baldwin Mills  
Robertsdale, Alabama

.....

**AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT**

.....

Filed in Office,

.....19.....

.....

Clerk.

.....

AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT

CC Law 12-2M-12/71 APOA

THE STATE OF ALABAMA }  
~~MOBILE~~ COUNTY  
BALDWIN

CIRCUIT COURT

Notary Public

Personally appeared before me, ~~John F. Markowitz, 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 25 day of October, 1972  
Baldwin  
in the Circuit Court of ~~Mobile~~ County, in Case No. 10,569 The Plaintiff

Alden's

recovered a judgment against Dianne Grubbs

the Defendant, whose address  
is c/o South Baldwin Mills, Robertsdale, Ala.

for the sum of TWO HUNDRED NINETY-TWO and 36/100 (\$292.36)

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

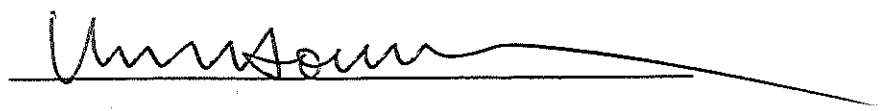
whose address is Robertsdale, Alabama

is supposed to be indebted to or have effects of the said Dianne Grubbs

in its possession or under its

control, and that he believes process of Garnishment against the said South Baldwin Mills  
Robertsdale, Ala.

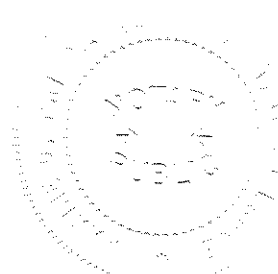
is necessary to obtain satisfaction of said Judgment.



Sworn to and subscribed this 6th  
day of December A.D., 1972

Marye D. Primm  
Notary Public ~~Sixth~~

My Commission Expires Jan. 28, 1975



No.....

---

**CIRCUIT COURT**

---

.....

Alden's

vs.

Dianne Grubbs  
c/o South Baldwin Mills  
Robertsdale, Alabama

.....

**AFFIDAVIT FOR GARNISHMENT  
ON JUDGMENT**

.....

Filed in Office,

.....19.....

.....

Clerk.

.....

STATE OF ALABAMA }

Baldwin County

TO Dianne Grubbs....., Defendant.....;

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

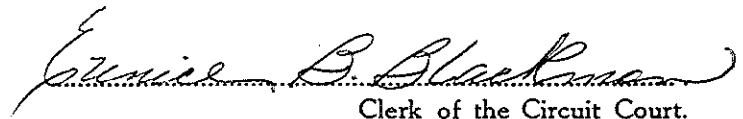
Alden's....., Plaintiff.....versus Dianne Grubbs....., Defendant.....,

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

South Baldwin Mills, Robertsdale, Alabama.....

has.... been named as Garnishee.....

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

7<sup>th</sup> day of December....., 1972...  
Clerk of the Circuit Court.

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

December TERM, 1972

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Oct Term, 1972, of the Circuit Court of Baldwin County, to-wit: On the 25th day of October, 1972, being a regular day of said term, ALDEN'S

recovered judgment against DIANNE GRUBBS

for the sum of Two Hundred Ninety-two and 36/100 - (\$292.36) Dollars, and cost of suit, and affidavit having been made by William L. Howell, Attorney that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

South Baldwin Mills, Robertsdale, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Dianne Grubbs or that it 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, 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.

You Are Therefore Hereby Commanded to Summon SOUTH BALDWIN MILLS, ROBERTSDALE, ALA.

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 Dianne Grubbs and whether it will not be indebted in future to said defendant Dianne Grubbs by a contract then existing, and whether by a contract then existing it 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 Dianne Grubbs

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

EUNICE B. BLACKMON

Witness, ALICE J. DUCK, Clerk of said Court, this 7th day of December, A. D., 1972.

Issued 7th day of December, A. D., 1972.

ATTEST:

Eunice B. Blackmon, Clerk.

Received 8 day of Dec 19 72  
and on 12 day of Dec 19 72  
I served a copy of the within writ  
on South Baldwin Mills

By service on David T. Luccum

TAYLOR WILKINS, Sheriff  
By H. H. Brown D.S.

R. Dale

50

Sheriff's claim \_\_\_\_\_ miles at  
Ten Cents per mile Total \$ \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
BY \_\_\_\_\_ DEPUTY SHERIFF

CIRCUIT COURT, BALDWIN COUNTY

No. 10, 569½

ALDEN'S

Plaintiff

VS.

GARNISHMENT ON JUDGMENT

DIANNE GRUBBS

Defendant

SOUTH BALDWIN MILLS, ROBERTSDALE,

Garnishee

Issued 7th day of Dec. 19 72

Returnable \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

RECEIVED

DEC 8 1972

TAYLOR WILKINS  
SHERIFF

William L. Howell

Attorney

Moore Printing Company, Bay Minette, Alabama

Brown

STATE OF ALABAMA }

Baldwin County

TO Dianne Grubbs Defendant.....;

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

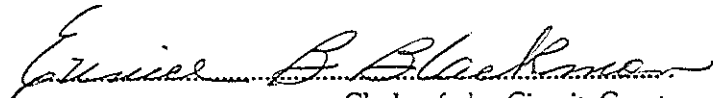
Alden's Plaintiff.....versus Dianne Grubbs Defendant.....

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

South Baldwin Mills, Robertsdale, Alabama .....

has.... been named as Garnishee.....

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

7th day of December, 1972.....  
Clerk of the Circuit Court.



*Brown*

CASE NO. 10,569½

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

DIANNE GRUBBS, Defendant

ALDEN/S

Plaintiff...

VS.

DIANNE GRUBBS

RECEIVED

DEC 8 1972

Defendant....

TAYLOR WILKINS  
SHERIFF

William L. Howell, Atty.

Sheriff claim \_\_\_\_\_ miles at

Ten Cents per mile Total \$ \_\_\_\_\_

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

By service on *X Dianne Grubbs* *Blanco*

TAYLOR WILKINS, Sheriff

By *W. Brown* D. S.

*R. Dale*

*50*

Received *8* day of *Dec* 19 *72*  
and on *12* day of *Dec* 19 *72*  
I served a copy of the within *W. Brown*  
on *Dianne Grubbs*