FOUNDED BY R. T. CRANE 1858 CRANE REGIONAL OFFICE 5941/2 Peachtree St., N. E.

UNLESS OTHERWISE SPECIFIED

TERMS: NET 30 DAYS.

OR 2%, 10TH PROX...

ATLANTA 3, GEORGIA

Fonder Company Fairhope, Alabama

262.50

CRANE CO.

CLYDE ARNOLD

MAY 18, 1954

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COPY OF STATEMENT AND IS OFEN AND UNPAID.

PLEASE FORWARD YOUR REMITTANCE TO THE ABOVE ADDRESS

FOUNDED BY R. T. CRANE 1855

5941/2 Peachtree St., N. E. ATLANTA 3, GEORGIA

Ponder Company Fairhope, Alabama

May 18, 1954

TERMS: NET 30 DAYS. OR 2%, 10TH PROX., UNLESS OTHERWISE SPECIFIED

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COPY

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P.O. BOX 1070
MOBILE 6, ALABAMA

GESSNER T. MªCCRYEY
BEN D. TURNER
C. M. A. ROGERS (1891-1957)
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES E. MAY, JR.
ALEX T. HOWARD, JR.
CHAUNCEY MOORE
J. JEPTHA HILL
CHARLES B. BAILEY, JR.

April 30th, 1958

Honorable Hubert M. Hall Judge of the Circuit Court of Baldwin County County Court House Bay Minette, Alabama.

Re: Crane Company, VS. J. M. Ponder, d/b/a J. M. Ponder & Company Circuit Court of Baldwin County, Alabama, at Law.

Dear Judge Hall:

The above case was filed on the civil side of your Court several years ago by the late C. M. A. Rogers of this firm and I wish to apologize for not properly tending to this case since Mr. Rogers' death over a year ago.

Please enter a non-suit for our firm in the above case and by carbon copy of this letter I am asking Mrs. Duck to send me the cost bill.

Best regards.

Yours very truly,

(Alex 1. Howard, Jr.)

ATH, jr/le.

c.c. Honorable Alice J. Duck, Clerk Circuit Court of Baldwin County County Court House Bay Minette, Alabama.

State of Alabama BALDWIN COUNTY

A.		i	i		lant:	e de la companya de l
YOU ARE HEREBY	Y NOTIFIED	that a Writ	of Garnishmer	nt has be	en issued in th	ne case of
STANDARD COFFEE	Company,	INC., A	Corporatio	1	<u> </u>	, Plaintiff
versus CECIL I.	DOWNEY					, Defendant
now pending in the Circui	t Court of	Baldwin Cou	ınty, Alabama,	Law Sid	e, in which	
•					•	•
WILLIAM HAB	VILLE, o	/o Breeze	Pine Bar	and Gr	Lll. Bay Mi	nette, Ala.
has been named as Garn		o Breeze	Pine Bar	and Gr	111, Bay Mi	nette, Ale.
	ishee					

NOTICE

TO DEFENDANT OF GARNISHMENT

R

BY

CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

STANDARD COPPEE COMPANY,

INC., a Corporation,

Plaintiff....

VS.

CECIL I. DOWNEY.

FILE

OC Defendant

ALIE I DUN, CLERK

State of Alabama BALDWIN COUNTY

TO CECIL I. DOWNEY	اَهُ). وهيدننسسندسسنسنس	Defendant	!	er = r
		- M		
YOU ARE HEREBY NOTIFIED that a Writ of	Garnishment	has been issue	d in the case	of
	•			
STANDARD COFFEE COMPANY, INC., A Co	rporation		, P	laintiff,
versus CECIL I. DOWNEY			, Def	endant,
now pending in the Circuit Court of Baldwin Count	y, Alabama, I	aw Side, in wl	n ic h	<u>.</u>
WILLIAM HARVILLE, c/o Breeze I	ine Bar a	nd Grill, E	ay Minett	e, Ala.,
ha S been named as Garnishee				
IN WITNESS WHEREOF, I have hereunto se	et my hand ar	nd affixed my s	eal on this th	e 3/
day of Oct , 1958				
not Jacon 1958		lece Cler	k of the Circ	e uit Court.

			2281/24
ceived 3/	day of	Oct 1958	NOTICE
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n eal	So ble	poney -	CLERK OF CIRCUIT COURT
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By service on			TO
	TAYLOR WILL	KINS, Sheritt	STANDARD COFFEE COMPANY,
a production of	Зу	, , , , , , , , , , , , , , , , , , ,	
			INC., a Corporation,
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Not found in my	county after d	illigent search and in	
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By_ <i>[</i>	U. a 2a	the f	vs.
5 3 4 6	100 miles 1824 183	Deputy Sheriff	CECIL I. DOWNEY,
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	* :		OCI 3/ 958 Defendant
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er S			ALICE I DUCK, CLERK REGISTER
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STANDARD COFFEE COMPANY. INC...

a Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-V5-

CECIL I. DOWNEY,

1. 11.15

day of

Defendant.

MARTIN PARRY CORPORATION. REPAIR DIVISION,

as Garnishee.

NOTICE TO DEPENDANT

To any Sheriff of the State of Alabama - Greeting:

You are hereby commanded to notify CECIL I. DOWNEY, that on the 16-M day of Sept 1994, a west of garnishment in the above stated case was issued to MARTIN PARRY CORPORATION, REPAIR DIVISION, as Garnishee. And you will return this writ according to law. WITNESS my hand this 15 they of Sele Received in office _____ day of

Executed by serving a copy of the within writ on

Sherlff

. 1954.

STANDARD COFFEE COMPANY, INC.,

a Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-VS-

CECIL I. DOWNEY,

Defendant.

MARTIN PARRY CORPORATION, REPAIR DIVISION,

as Carmishee.

MOTICE TO DEFENDANT

To any Sheriff of the State of Alabama-Greeting:

	You are	hereby commanded	to notify CECII	I. DOWNEY.
that on th		day of		
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STANDARD COFFEE COMPANY, INC., a Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-V 5-

CECIL I. DOWNEY.
Defendant

MARTIN PARRY CORPORATION. as Garnishee.

WRIT OF GARNISHMENT

To any Sheriff of the State of Alabama -- Greeting:

WHEREAS, E. G. Rickarby, Jr., Attorney for Plaintiff, has made affidavit as required by law that on the 22nd day of July, 1954, the Circuit Court of Baldwin County, Alabama, recovered a judgment against Cecil I. Downey for the sum of Four Hundred Sixty-five and \$7/100 (\$465.57) Dollars and the further sum of Nine and 70/100 Dollars (\$9.70) cost of suit; and that he believes the process of garmishment is necessary to obtain satisfaction of said judgment, and that Martin Parry Corporation has, or is believed to he indebted to the defendant, or to be liable to him 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.

These are therefore to command you, that you summon the said Martin Parry Corporation, Garnishee, to be and appear at Circuit Court of Baldwin County, Alabama, to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on cath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession or under its control any money or effects belonging to the defendant; and whether he is indebted to said defendant, or is liable to him on any contract for the payment of money or the delivery of personal property or on a contract for the payment of money which may be discharged by the delivery of personal property.

	WITNESS	my	hand	AS	Clerk of	said	Court	at	office,	this
20					1954.	•			•	

STANDARD COFFEE COMPANY, INC.,

A Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-V8-

CECIL I. DOWNEY.

Defendant

MARTIN PARRY CORPORATION.

As Carmishee.

AFFIDAVIT FOR GARMISHUM

Personally appeared before me,

a Notary Public for said County and said State, E. G. Rickarby, Jr., Attorney for Plaintiff, in the above mentioned cause, who being duly sworn, deposes and saith that the STANDARD COFFEE COMPANY, INC., a Corporation, on the 22nd day of July, 1954, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against CECIL I. DOWNEY for the sum of Four Hundred Sixty-five and 57/100 Dollars (\$465.57), and the further sum of Nine and P/100 (\$9.70) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that MARTIN PARRY CORPORATION is believed to have in its possession or under its control, money or effects belonging to the defendant, or is believed to be indebted to the defendant, or is liable to him on a contract for the delivery of personal property, or on a centract for the payment of money which may be discharged by the delivery of personal property.

Sworm	to and	aubserlbed	before	me	this	the	day	of
. 19	54.						 	

STANDARD COFFEE COMPANY, INC.,

A Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

wV3-

CECIL I. DOWNEY.

Defendant

MARTIN PARRY CORPORATION.

As Garnishee.

AFFIDAVIT FOR GARNISHMENT

Personally appeared before me.

a Notary Public for said County and said State, E. G. Rickarby, Jr., Attorney for Plaintiff, in the above mentiamed cause, who being duly sworn, deposes and saith that the STANDARD COPPEE COMPANY, INC., a Corporation, on the 22nd day of July, 1954, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against CECIL I.

DOWNEY for the sum of Four Hundred Sixty-five and 57/100 Dollars (\$465.57), and the further sum of Nine and D/100 (\$9.70) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that MARTIN PARRY CORPORATION is believed to have in its possession or under its control, money or effects belonging to the defendant, or is believed to be indebted to the defendant, or is liable to him 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.

Sworn	to	and	subscribed	before	mo	this	the		day	of
_ , 19	154.	•						1		

ELLIOTT G. RICKARBY
(DECEASED)

RICKARBY & RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

13 September 1954

Mrs. Alice J. Duck Clerk Circuit Court Bay Minette, Ala.

No: 2281

Dear Mrs. Duck:

Re: Standard Coffee Co.

Vs: Cecil I. Downey

Enclosed find garnishment proceedings against Mr. Cecil I. Downey in the case of Standard Coffee Co. vs. Downey.

Pleas e process and oblige.

The garnishee is Martin Parry Corporation, Repair Division, whose address is 10 North Franklin Street, Mobile, Alabama.

Yours very truly,

E. G. Rickarby, Jr.

R/i cc: Standard Coffee Co. Encls. 1952 General Offices Toledo, Ohio

Rexair Division



PLEASE REPLY TO ->

10 N. Franklin St. Mobile, Ala. Oct.11th.1954

Circuit Court
Bay Minette, Ala.

To whom it may concern:

In regards to writ of Garnishment filed in Circuit Court in Baldwin County, Sept. 15,1954, and served to me on Oct.14,1954 here to.

Standard Coffee Co. Inc. a Corporation Plaintiff

VS

Cecil I. Downey defendent

Martin Parry Corp. as Garnishee.

The above is no longer in our employment and we are not indebted to him or he to us as of Oct. 1,1954.

MLK:mf

FÖRM MP-30 T H | SOM-RSPE PRINTED IN U.S.A.

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CONDITIONED AND HIMIDIFIER

Branch Manager

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Cecil L. Downey

STANDARD COFFEE COMPANY, INC.

Importers and Manufacturers of HIGH GRADE COFFEES, TEAS, SPICES, FLAVORINGS, ETC.

Principal Offices and Factory NEW ORLEANS

DATE April 24, 1954

					
ludit Teb.20,1954	Pensacola, Fla. #2 Mdse. not accounted for Prem. mdse. over Overage last audit Cash Bond Interest on Cash Bond	633		22 28 340 2	88
	Discrepancies in customer account	195 8 5 9		393	44
	Balance Due Us	465	57		

STATE OF LOUISIANA PARISH OF ORLEANS

Before me, the undersigned Notary Public in and for the State and Parish
aforesaid, on this day personally came and appeared F.H.Boatner
know to me who, being by me duly sworn, states on oath that the foregoing and
annexed account in favor of STANDARD COFFEE COMPANY, INC., which is a
corporation organized and existing under the laws of the State of Louisiana, and
of which corporation affiant is the authorized Secretary, and which ac-
count is against C.I.Downey of Pensacola, Fla.
FOR THE SUM OF Four hundred Sixty-Five Dollard - Fifty-seven Cents -(\$465.57)
is within the knowledge of affiant, just and true; that it is due and unpaid, and that
all just and lawful offsets, payments and credits have been allowed.
Sworn to and subscribed before me, the 24th day of May, 1954 My commission expired with death

STATE OF LOUISIANA PARISH OF ORLEANS

Befo	re me, the undersigned Notary Public in and for the State and Parish
aforesaid	i, on this day personally came and appeared
know to r	me who, being by me duly sworn, states on oath that the foregoing and
annexed a	account in favor of STANDARD COFFEE COMPANY, INC., which is a
corporati	ion organized and existing under the laws of the State of Louisiana, and
of which	corporation affiant is the authorized, and which ac -
count is	against C.I.Downey of Pensacola, Fla.
FOR THE	E SUM OF Four bundred Sixty-Five Bollard - Fifty-seven Cents -(\$465.57)
is within	the knowledge of affiant, just and true; that it is due and unpaid, and that
all just a	nd lawful offsets, payments and credits have been allowed.
Sworn to	and subscribed before me, the 24th day of May, 1954 Wy commission expired with death. Swell O County, Indiana.

S-9111

STANDARD COFFEE COMPANY, INC.

Importers and Manufacturers of HIGH GRADE COFFEES, TEAS, SPICES, FLAVORINGS, ETC.

Principal Offices and Factory NEW ORLEANS

DATE May 24,1954

M	Cecil	T. Downey		,			
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S-9111

STANDARD COFFEE COMPANY, INC.

Importers and Manufacturers of HIGH GRADE COFFEES, TEAS, SPICES, FLAVORINGS, ETC.

Principal Offices and Factory NEW ORLEANS

DATE May 24, 1954

Aud1t Feb. 20,1954	Pensacola, Fla. # 2 Mdse. not accounted for Prem. mdse. over Overage Lest Audit Cash Bond Interest on Cash Bond Disorepancies in customers accounts	66 3		22 25 340 2	45 86 00 11
	hreer about the site experts a medicine	959		303	44
	Balance Due Us	465	57		

DAI DUIN COINTY	CIRCUIT COURT, BALDWIN COUNT
No	TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA	.
You Are Hereby Commanded to Summon	Cecil I. Downey
A	
to appear and plead, answer or demur, within thirty days to the Circuit Court of Baldwin County, State of Alabama, a Cecil I. Downey	
by Standard Coffee Company, Inc., a	
Witness my hand thisday of	May 19 54
	also french, cle

ILL : D

2 So. Twentieth St. BIRMINGHAM 3, ALA.

FOUNDED BY R. T. CRANE 1856

ANALYSIS OF FINAL BALANCE

OTHERWISE SPECIFIED

TERMS: NET 30 DAYS,

OR 2%, 10th PROK., UNLESS

Ponder 6 o. Box 13		*
Box 13	•	Pander da
		Fairhope, Ala.

HEREBY CERTIFY THAT THIS IS A TRUE D CORRECT STATEMENT OF ACCOUNT AND YMENT THEREFOR HAS NOT BEEN RECEIVED.

GRANE CO. ***

MAY 3, 1954

Reg. Acct.

1825-

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PLEASE FORWARD YOUR REMITTANCE TO THE ABOVE ADDRESS

CRANE COMPANY, a corporation,

IN THE CIRCUIT COURT OF

Plaintiff, :

BALDWIN COUNTY, ALABAMA.

۷S .

n air

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:

:

J. M. PONDER, doing business under the name and style of J. M. PONDER & COMPANY,

AT LAW.

Defendant.

Comes now the Defendant in the above styled cause and demurs to the complaint, and to each count thereof, separately and severally, and for grounds of demurrer, separately and severally, assigns the following, separately and severally:

- For that said complaint does not state a cause of action. l.
- For that said count does not state a cause of action. 2.
- З. For aught that appears Defendant is not indebted to the Plaintiff on an account stated.
- For aught that appears Defendant is not indebted to the Plaintiff on the account stated referred to in Count 2 of the complaint.
- For aught that appears the endorsement on the original complaint refers to the fact that there is attached to the complaint an itemized verified statement of the account, refers to Count 2 of the complaint, and Section 378 of Title 7 of the Code of Alabama of 1940 is not applicable to suit on account stated as a matter of law.
- For that it affirmatively appears that the statement of account attached to the original complaint is not itemized as required by Section 378 of Title 7 of the Code of Alabama of 1940.
- For that it affirmatively appears that the statement of account attached to the original complaint is not certified as required by Section 378 of Title 7 of the Code of Alabama of 1940.
- For that the verification of Clyde Arnold attached to the original bill of complaint purports to be under the seal of affiant

and it affirmatively appears that said affiant's seal is not affixed thereto.

- 9. For aught that appears the verification of clyde Arnold attached to the original bill of complaint refers only to one of the several accounts purported to be attached, itemized and verified.
- 10. For that it affirmatively appears that suit is here brought on more than one account and it does not appear that all of said accounts are itemized and verified as required by law.
- ll. For that it appears that said accounts made the subject of this suit are certified by some one other than a Notary Public or any officer having authority under the laws of this or any other state to take and certify affidavits.
- 12. For that the verification of Clyde Arnold attached to the original bill of complaint states that the items stated in and composing the account were sold and delivered to the Defendant but that it affirmatively appears that said accounts are not itemized.
- 13. For that it affirmatively appears that the statements of account attached to the original complaint are in the name of Ponder Company and the Defendant is here sued as J. M. Ponder doing business under the name and style of J. M. Ponder & Company.
- 14. For aught that appears the accounts on which suit is here brought are owed to Plaintiff by some one other than the named Defendant.
- 15. For aught that appears the verification of Clyde Arnold refers to a debtor other than the named Defendant.
- 16. For aught that appears the Defendant was not indebted to the Plaintiff on, to-wit, November 24, 1953.

BY Liver Attorneys for the Defendant.

CRANE COMPANY, a corporation,

Plaintiff.

Defendant.

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

-vs-

J. M. PONDER, doing business under the name and style of J. M. PONDER & COMPANY,

The plaintiff claims of the defendant \$920.41 due from him by account on, to-wit, the 224th day of November, 1953, which sum of money, with the interest thereon, is still unpaid.

:

- The plaintiff claims of the defendant the further sum of \$920.41 on account stated between the plaintiff and the defendant on, to-wit, the 24th day of November, 1953, which sum of money, with the interest thereon, is still unpaid.
- The plaintiff claims of the defendant the further sum of \$920.41 due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit, the 24th day of November, 1953, which sum of money, with the interest thereon, is still unpaid.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

ttorneys for the Plaintiff.

NOTE:

There is attached to the complaint an itemized, verified statement of the account made the subject of this action.

The defendant, J. M. Ponder, resides at or near Fairhope, Alabama, and does business in Fairhope, Alabama under the name and style of Ponder Company.

STATE OF GEORGIA

COUNTY OF Julian

∠_, a Notary Public in and for said state and county, personally appeared Clyde Arnold, who is known to me who being by me first duly sworn deposes and says that he is Credit Supervisor of Crane Co., a corporation organized and doing business under the laws of the State of Illinois and authorized to do business within the State of Alabama; that the attached account against J. M. Ponder, doing business under the name and style of Ponder Company, Fairhope, Alabama, is just and correct within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the correctness of the account; that the items therein stated and composing the said account were sold and delivered to the said J. M. Ponder, doing business under the name and style of Ponder Company, at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which account is entitled as thereon stated and that the balance thereof amounting to the sum of Nine Hundred Twenty and 41/100 Dollars (\$920.41) with interest/from November 24th , 19 53, is justly due and remains unpaid.

Clyde Arnold

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office with my seal hereto affixed on this the _____ day of May, 1954.

A Notary Public in and for the State of Georgia, County of Julyan

My Commission Expires May 6, 1956



MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P. O. BOX 1070
MOBILE 6. ALABAMA

GESSNER T. MCCORVEY
BEN D. TURNER
C.M. A. ROGERS (1891-1057)
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES E. MAY, JR.
ALEXT. HOWARD, JR.
CHAUNCEY MOORE
J. JEPTHA HILL
CHARLES D. BAILEY, JR.

April 30th, 1958

Honorable Hubert M. Hall Judge of the Circuit Court of Baldwin County County Court House Bay Minette, Alabama.

Re: Crane Company, VS. J. M. Ponder, d/b/a J. M. Ponder & Company Circuit Court of Baldwin County, Alabama, at Law.

Dear Judge Hall:

The above case was filed on the civil side of your Court several years ago by the late C. M. A. Rogers of this firm and I wish to apologize for not properly tending to this case since Mr. Rogers' death over a year ago.

Please enter a non-suit for our firm in the above case and by carbon copy of this letter I am asking Mrs. Duck to send me the cost bill.

Best regards.

Yours very truly,

Alex T. Howard, Jr.)

ATH, jr/le.

c.c. Honorable Alice J. Duck, Clerk Circuit Court of Baldwin County County Court House Bay Minette, Alabama. TELEPHONE WA 8-9836

E. G. RICKARBY

BANK BUILDING FAIRHOPE, ALABAMA

October 22, 1958

Mrs. Alice Duck Clerk of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

On the 22nd day of July, 1954, we recovered a judgment against defendant for the sum of \$465.57 plus costs. Since that time, he has paid this debt down to \$380.27; however, nothing has been paid on it since 1956.

Therefore, request you process these papers and hand them to sheriff to serve, and when same is done, please notify me. Am enclosing my check in the sum of \$20.00 to cover costs.

Yours very truly,

ts encl. cc: (Standard Coffee Co.)

cc: (Standard Coffee Co.)

The temp that this man is not

worth the plan thou

STANDARD COFFEE COMPANY, INC., A Corporation,

Plaintiff,

-VS
CECIL I. DOWNEY,

Defendant,

WILLIAM HARVILLE, as Garnishee.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AFFIDAVIT FOR GARNISHMENT

Before me, the undersigned Notary Public, personally appeared E. G. RICKARBY, Attorney for the Plaintiff, who being duly sworn doth depose and say that the said STANDARD COFFEE COMPANY, INC., a Corporation, on the 22nd day of July, 1954, recovered judgment against CECIL I. DOWNEY for the sum of FOUR HUNDRED AND SIXTY-FIVE and 57/100 DOLLARS (\$465.57), and the further sum of NINE and 70/100 DOLLARS (\$9.70) cost of suit, and that there is still outstanding on this judgment the sum of THREE HUNDRED AND EIGHTY and 27/100 DOLLARS (\$380.27); and that he believes the process of garnishment against WILLIAM HARVILLE is necessary to obtain satisfaction of said judgment, and that the said WILLIAM HARVILLE is supposed to be indebted to or have effects of the said defendant in his possession, or under his control.

E. G. BICKARBY, Attorney for Plaintiff.

Sworn to and subscribed before me this 30thday of Och., 1958.

ALICE J. DUCK CLERK

Notary Public, Baldwin County, Ala.

Garnis	hment on Judgme	nt.				
The S	tate of Alabar		CIRCUI	T COURT,	BALDWIN CO	UNTY
Ва	ldwin County)				TERM, 19
To any	Sheriff of the	State of A	Alabama,	Greeting	:	
	HEREAS, at a regular.					
	on the 22nd					
said term	,STANDA	RD COFFEE	COMPANY	, INC., a	Corporati	on,
recovered	judgment against	CECIL I. I	OOWNEY			
S. J. 1985 Francisco and the second second	a containin talent seeda aan aan aan aan aan aan aan aan aan a	ANTHYMOSOLYMOSONYHMALINATS-moderallyllillinning (1) 1901. Laborate Anthropolic Collins (1) 1901.	a waran dipungsing telephonology dalamini telephonological production of the		/AS/ANI hamagapungan/a	
and affida	at there is stirvit having been made b	by E. G. RI	CKARBY.	Attorney	for the P	
	ess of garnishment is bel		essary to obta	ain satisfaction	n of such Judgm	ent, and that the
following	named persons or corp	orations, viz:			eta.	
	WILLIAM HAR	TILE,				
						· ;
		···.				,
Marian Marian Marian		Charles and			· .	
hee or is	believed to have in _b	1s -	possession. o	r under h	is	_control money
6.5	belonging to said defen					is, o
10-10						•
	d to be indebted to said or the delivery of perso				growing and the second	
	d by the delivery of person					Which may 5
	You Are Therefore F					LLE,
c/	o Breeze Pine I	Bar and Gr	ill, Bay	MINESTE:	, ALADOMO .	
					·	the Count Warr
	appear before the hono					_
thereof, i	n the city of Bay Minet	te, on the		Monday in		_A. D. 19
then and	there within the three	first days of the	term, to ans	wer on oath,	whether at the ti	me of the servic
	rnishment, or at the t					
ing the g	arnishment, and makin	g the answer	he_w	as	indebted	to said defendar
	and wh	ether he	}7	will not be ind	lebted in future	to said defendan
	by a contrac	and the second s	***************************************	·	**************************************	ne
is, or are	, liable to said defendar	and the second s				
may be d	ischarged by the delive	ry of personal p	roperty, or	which is pa	yable in person	al property, an
whether.	be has	not in his	sposse	ession or unde	his	control money (
	longing to the defenda					

Herein fail not, and have you then and there this Writ. Issued_____A. D., 19____

STANDARD COFFEE COMPANY, INC., A Corporation,

Plaintiff,

-VS
CECIL I. DOWNEY,

Defendant,

WILLIAM HARVILLE, as Garnishee.

AFFIDAVIT FOR GARNISHMENT

Before me, the undersigned Notary Public, personally appeared E. G. RICKARBY, Attorney for the Plaintiff, who being duly sworn doth depose and say that the said STANDARD COFFEE COMPANY, INC., a Corporation, on the 22nd day of July, 1954, recovered judgment against CECIL I. DOWNEY for the sum of FOUR HUNDRED AND SIXTY-FIVE and 57/100 DOLLARS (\$465.57), and the further sum of NINE and 70/100 DOLLARS (\$9.70) cost of suit, and that there is still outstanding on this judgment the sum of THREE HUNDRED AND EIGHTY and 27/100 DOLLARS (\$380.27); and that he believes the process of garnishment against WILLIAM HARVILLE is necessary to obtain satisfaction of said judgment, and that the said WILLIAM HARVILLE is supposed to be indebted to or have effects of the said defendant in his possession, or under his control.

Sworn to and subscribed before me this 30th day of Oct., 1958.

Notary Public, Baldwin County, Ala.

Ger 31, 958

ALLE 1 DUCK, CLERK REGISTER

The State of Alabama,	{	CIRCUIT C	OURT, BA	rdwin con	YTN	
Baldwin County)				rerm, 19	·
To any Sheriff of the State	of Ala	abama, Gre	eting:			
WHEREAS, at a regularJu	ly′	Term,19 <u>54</u> ,	of the Circu	it Court of Ba	ldwin Cou	nty,
to-wit: On the22ndday of	Jul:	у	, 19_5	4, being a re	egular da	y of
said term, STANDARD CO	FFEE CO	OMPANY, I	NC., a Co	orporatio	<u></u>	
			•••••••••••••••••••••••••••••••			••••••
recovered judgment againstCECII	. I. DO	WNEY		***************************************	***************************************	
			· · · · · · · · · · · · · · · · · · ·			
		***************************************				*******
for the sum of FOUR HUNDRED AND and that there is still over and affidavit having been made by E. O	SIXTY ving on L. RICK	FIVE and said jud ABBY, Att	57/100 gment th orney fo	Dollars, an e sum of r the Pla	d cost of \$380.2 Lintiff	suit, ?,
that process of garnishment is believed to		ry to obtain sa	tisfaction of	such Judgmen	t, and tha	t the
following named persons or corporations,	viz:					:
WILLIAM HARVILLE,					. 6	<u>.</u>
				. :	·-	
has or is believed to have in his	poss	ession, or und	er his	-	control m	oney
or effects belonging to said defendant		o:	that he		i	s. or
is believed to be indebted to said defendar						
contract for the delivery of personal prope						
discharged by the delivery of personal pro-					·	
You Are Therefore Hereby C	commanded	to Summon	WILLIA	M HARVILI	Æ,	
c/o Breeze Pine Bar and				**		
						_
	***	**************************************				
to be and appear before the honorable Juc						_
thereof, in the city of Eay Minette, on th	e	Monda	ay in	<i>A</i>	A. D. 19 <u>.</u> 5	8,
then and there within the three first days	of the terr	n, to answer o	ı oath, wheth	er at the time	of the ser	vice
of the garnishment, or at the time mak	ing his	answer, or	at any time i	ntervening th	e time of	serv-
ing the garnishment, and making the ans	wer	hewas		_ indebted to	said defen	.dant
and whether						
is, or are, liable to said defendants for the						
may be discharged by the delivery of pers						
whether he has not in						
effects belonging to the defendant	his	possession	or under	hisco	ntrol mon	ey or
Herein fail not, and have you then	CECIL	I. DOWNE this Writ.	<u>Y</u>			
	CECIL	I. DOWNE this Writ.	<u>Y</u>			
Herein fail not, and have you then	CECIL and there Court, the	I. DOWNE this Writ.	Y . day of(
Herein fail not, and have you then Witness, ALICE J. DUCK, Clerk of said	CECIL and there	T. DOWNE this Writ. is 3./	Y . day of(

STANDARD COFFEE COMPANY, INC., a Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-VS-

CECIL I. DOWNEY,
Defendant

MARTIN PARRY CORPORATION, as Garnishee.

WRIT OF GARNISHMENT

To any Sheriff of the State of Alabama - Greeting:

WHEREAS, E. G. Rickarby, Jr., Attorney, for Plaintiff, has made affidavit as required by law that on the 22nd day of July, 1954, the Circuit Court of Baldwin County, Alabama, recovered a judgment against Cecil I. Downey for the sum of Four Hundred Sixty-five and \$7/100 (\$465.57) Dollars and the further sum of Wine and 70/100 Dollars (\$9.70) cost of suit; and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that Martin Parry Corporation has, or is believed to he indebted to the defendant, or to be liable to him 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.

These are therefore to command you, that you summon the said Martin Parry Corporation, Garnishee, to be and appear at Circuit Court of Baldwin County, Alabama, to be holden for said county, within thirty days after the service of this writ of garnishment, then and there to answer on oath, whether at the time of the service of this writ, or at the time of making its answer, it has in its possession or under its control any money or effects belonging to the defendant; and whether he is indebted to said defendant, or is liable to him on any contract for the payment of money or 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.

WITNESS my hand as Clerk of said Court at office, this day of ______, 1954.

9-15-55

Recelebrate Clerk.

STANDARD COFFEE COMPANY, INC.,

A Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-VS-

CECIL I. DOWNEY,

Defendant

MARTIN PARRY CORPORATION,

As Garnishee.

AFFIDAVIT FOR GARNISHMENT

J. H. Arnold, Personally appeared before me, a Notary Public for said County and said State, E. G. Rickarby, Jr., Attorney for Plaintiff, in the above mentioned cause, who being duly sworn, deposes and saith that the STANDARD COFFEE COMPANY, INC., a Corporation, on the 22nd day of July, 1954, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against CECIL I. DOWNEY for the sum of Four Hundred Sixty-five and 57/100 Dollars (\$465.57), and the further sum of Nine and 70/100 (\$9.70) cost of suit, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that MARTIN PARRY CORPORATION is believed to have in its possession or under its cohtrol, money or effects belonging to the defendant, or is believed to be indebted to the defendant, or is liable to him 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.

Sworn to and subscribed before me this the Lath day

September, 1954.

Notary Public, Baldwin County, Alabama,

ALIGE I. WILL CLEAR

STANDARD COFFEE COMPANY, INC.,

a Corporation,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-VS-

CECIL I. DOWNEY,

Defendant.

MARTIN PARRY CORPORATION, REPAIR DIVISION,

as Garnishee.

NOTICE TO DEFENDANT

To any She	riff of the State of Ala	cama—Greeting:		
	ing the state of t			
	You are hereby commanded			
that on th	e 15-th day of	ept., 1954,	a writ of	
garnishmen	t in the above stated cas	se was issued to	MARTIN PARRY	
CORPORATIO	N, REPAIR DIVISION, as Ga	arnishee.		
and the control of th	And you will return this	writ according	to law.	
	WITNESS my hand this/	5 May of Se	<u> 加大</u> , 1954。	
		Muie	In recep	2
		Cler	·k.	
			v v	
	Received in office	day of	. 195/-	
	**************************************	<u> </u>		
				4
·		She	73.7	
	Executed by serving a co	py of the within	writ on	
day of	, 1954.			
		·		
		She	riff	

9-15-54

ALICE I. SUGA, SIAGA

ELLIOTT G. RICKARBY (DECEASED)

RICKARBY & RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

28 May 11954

Mrs. Alice J. Duck Clerk Circuit Court Bay Minette, Ala.

Dear Mrs. Duck:

Re: Standard Coffee Co.

Vs: Cecil I. Downey

With this we are sending you summons and complaint, itemized and verified statement of account and deposit for costs in the sum of \$15.00 in the above case.

Mr. Downey lives in Bay Minette,

Yours very truly,

E. G. Rickarby, Jr.

R/i Encl. 1952 STANDARD COFFEE COMPANY, INC.,

a Corporation, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-VS-

CECIL I. DOWNEY,

Defendant

Transfer

COMPLAINT

COUNT ONE: The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY FIVE and 57/100 DOLLARS (\$465.57) due from him by account on the 20th day of February, 1954; which sum of money with interest thereon is still due and unpaid.

RICKARBY & RICKARBY

By:

E. G. Rickarby, Jr., Attorney for Plaintiff

The account sued on is evidenced by an itemized and verified statement of account filed herewith.

RICKARBY & RICKARBY

BT.

E. G. Ricker by, Jr., Attorney for Plaintiff