

2390

WILLIAM E. CADDEN, d/b/a,
PRICHARD INSURANCE AGENCY,
Prichard, Alabama,
Plaintiff,

VS.

C. S. TRAWICK AND SONS, a
Partnership, composed of
C. S. TRAWICK AND EUGENE
TRAWICK,
Defendants.

)
)
) IN THE CIRCUIT COURT OF BALDWIN
) COUNTY, ALABAMA.
) CIVIL DIVISION
)
) CASE NUMBER: _____
)

COUNT ONE

The plaintiff claims of the defendants the sum of Two
Hundred Thirty-Two and 60/100 (\$232.60) Dollars, due the plaintiff
from the defendants on account for insurance premiums, due and
owing from defendants since the 12th day of February, 1954, which
~~sum with interest thereon is still unpaid.~~

Attorney for Plaintiff

ADDRESS OF DEFENDANTS:

C. S. TRAWICK AND SONS
State Highway # 3
Foley, Alabama

FILED

9-20-54

ALICE J. DUCK, Clerk

J. R. MERIWETHER
ATTORNEY AT LAW
118 CLARK STREET
PRICHARD, ALABAMA

September 18, 1954

Hon. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minnett, Alabama

Re: Wm. E. Cadden Vs. C. S. Trawick
and Sons.

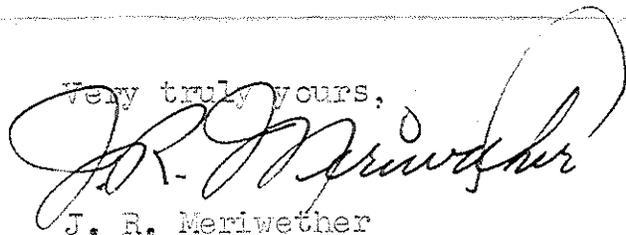
Dear Mrs. Duck;

Enclosed please find complaint herewith filed in the
above styled cause.

Please advise me as to when service is had, and the date
and time for which trial of cause is set, together with case
number.

Many thanks for your consideration.

Very truly yours,



J. R. Meriwether

JRM/s

Garnishment on Judgment.

The State of Alabama, }
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 19....., of the Circuit Court of Baldwin County, to-wit: On the 16th day of ~~xxxx~~ November, 1955, being a regular day of said term, William E. Cadden, d/b/a Prichard Insurance Agency, Prichard, Alabama recovered judgment against ~~.....C...S...Trawick and Sons, a Partnership composed of.....~~ C. S. Trawick and Eugene Trawick, Foley, Alabama

for the sum of Two Hundred Forty-Five and 15/100 Dollars, ~~and cost~~ ^{including} of suit, and affidavit having been made by J. R. Meriwether, Attorney that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, viz:

PETROLANE COMPANY, Laurel Avenue, Foley, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Eugene Trawick or that it is, or is believed to be indebted to said defendant Eugene Trawick 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 Comanded to Summon Petrolane Company, Foley, Alabama

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, on the..... Monday in..... A. D. 19....., then and there within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the time making its answer, or at any time intervening the time of serving the garnishment, and making the answer it was then indebted to said defendant Eugene Trawick and whether it will not be indebted in future to said defendant Eugene Trawick by a contract then existing, and whether by a contract then existing ~~with him or~~ 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 Eugene Trawick

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

Witness, ALICE J. DUCK, Clerk of said Court, this 8th day of Feb, A. D., 1955

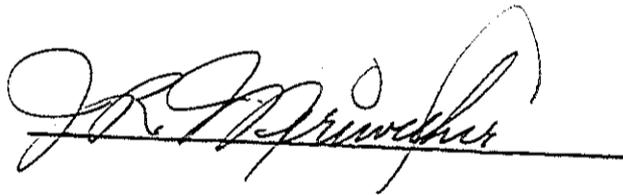
Issued..... day of..... A. D., 19.....

ATTEST:

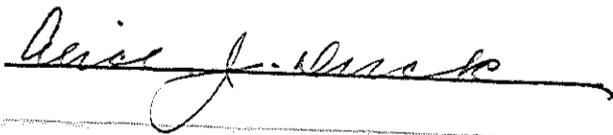
Alice J. Duck, Clerk.

STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, Alice J. Duck, Circuit Clerk Of Baldwin County, Alabama, personally appeared J. R. Meriwether, who, being by me duly sworn, on oath doth depose and say that he is Attorney of Record for William E. Cadden, and of his personal knowledge says that Eugene Trawick, a partner of C. S. Trawick and Sons, Foley, Alabama, is by judgment indebted to William E. Cadden in the sum of Two Hundred Forty-Five and 15/100 (\$245.15) Dollars, said judgment being taken November 16, 1954, and that Petrolane Company, Foley, Alabama, is supposed to be indebted to the said defendant, Eugene Trawick, or to have effects of the said defendant, Eugene Trawick, in its possession or under its control and that he believes that the process of Garnishment against the said Eugene Trawick is necessary to obtain satisfaction of said judgment; and that the said Petrolane Company, Foley, Alabama, is believed to be chargeable as garnishee in said cause and that this writ is not for the purpose of vexing the said defendant or harassing said defendant or for any improper motive.



Sworn to and subscribed before me on this the 8th day of
February, 1955.



NOTICE TO DEFENDANT OF GARNISHMENT

BOOK 003 PAGE 454

STATE OF ALABAMA,
BALDWIN COUNTY

TO Eugene Trawick
....., Defendant

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

William E. Cadden d/b/a Prichard Insurance Agency, Plaintiff

versus C. S. Trawick & Sons, a partnership composed of C. S. Trawick and Eugene Trawick, Defendant.....

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

Petrolane Company, Foley, Alabama.....

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 3th

day of February, 1945.

Alice J. Ulrich
Clerk of the Circuit Court.