

STATE OF ALABAMA |

IN THE CIRCUIT COURT OF

BALDWIN COUNTY |

BALDWIN COUNTY, ALABAMA

S. P. JOHNSON, individually  
and doing business as  
JOHNSON-O'CONNOR,

NO. 2657

Plaintiff,

vs.

WILLIE E. BROWN,

Defendant.

COUNT ONE:

Plaintiff claims of the defendant the sum of One Hundred Fifty-seven and no one-hundredths (\$157.00) by promissory note made on the 12th day of July, 1949; which sum of money together with the interest thereon is still due and unpaid.

Plaintiff alleges that in and by the terms of said note defendant waived all right of exemption under the Constitution and Laws of the State of Alabama; and further agreed to pay a reasonable attorney's fee for the collection of same; which plaintiff claims to-wit \$50.00.

  
ATTORNEY FOR PLAINTIFF

Defendant's address is:

Daphne, Alabama  
1/2 mile from Daphne on Loxley Road.

State of Alabama  
BALDWIN COUNTY

TO WILLIE E. BROWN, Defendant.....

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

S.P. JOHNSON, INC. & d/b/a JOHNSON O'CONNOR, Plaintiff.....

versus WILLIE E. BROWN, Defendant.....

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

PEYTON HIGGINSON 59½ St. Francis Street, Mobile, Alabama

have... been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 18

day of Jan., 1956.....

*Reese Jones*  
Clerk of the Circuit Court.

Garnishment on Judgment.

The State of Alabama,  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

January

TERM, 19 56

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular Sept. Term, 19 55, of the Circuit Court of Baldwin County,  
to-wit: On the 20 day of Sept., 19 55, being a regular day of  
said term, S. P. JOHNSON, IND? & doing business as JOHNSON O'CONNOR

recovered judgment against

WILLIE E. BROWN

for the sum of TWO HUNDRED FORTY-EIGHT AND 52/100 (\$248.52) Dollars, and cost of suit,  
and affidavit having been made by William H. Cowan  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

PEYTON HIGGISON, 59 1/2 St. Francis Street, Mobile, Alabama

has or is believed to have in their possession, or under their control money  
or effects belonging to said defendant Willie E. Brown or that he is, or  
is believed to be indebted to said defendant Willie E. Brown 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

PEYTON HIGGISON, 59 1/2 St. Francis Street, Mobile, 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 within (thirty) thirty days Monday in Jan. A. D. 19 56,  
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 their answer, or at any time intervening the time of serv-  
ing the garnishment, and making the answer they were indebted to said defendant  
Willie E. Brown and whether they will not be indebted in future to said defendant  
Willie E. Brown by a contract then existing, and whether by a contract then existing they  
~~are~~ 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 they have ~~have~~ not in their possession or under their control money or  
effects belonging to the defendant Willie E. Brown

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

Witness, ALICE J. DUCK, Clerk of said Court, this 18 day of Jan., A. D., 19 56.

Issued 18 day of Jan., A. D., 19 56.

ATTEST:

Alice J. Duck, Clerk.

THE STATE OF ALABAMA,  
MOBILE COUNTY

CIRCUIT COURT

the undersigned Notary Public

Personally appeared before me, ~~John E. Baldwin, Clerk of the County Court~~ in and for ~~Mobile County~~  
the State of Alabama at Large  
~~and State at Large~~

as Johnson-O'Connor S. P. Johnson, Ind. & doing business  
who being duly sworn, on oath says, that on the 20th day of September 19 55  
of the Circuit Court of ~~Mobile County~~ Alabama, he

recovered a judgment against Willie E. Brown

for the sum of  
Two Hundred Forty-eight and 52/100 (\$248.52) Dollars,

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect; that  
PEYTON HIGGISON, 59 1/2 St. Francis Street, Mobile, Alabama

supposed to be indebted to or have effects of the said Willie E. Brown

in its possession, or under its control, and that he believes process of  
Garnishment against said Peyton Higgison

is necessary to obtain satisfaction of said Judgment,

Sworn to and subscribed this  
day of January A. D., 19 56

*Marcella M. Cowan*  
NOTARY PUBLIC, STATE OF ALABAMA AT LARGE.

*William H. Cowan*  
William H. Cowan, Attorney