

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

June 7, 1958

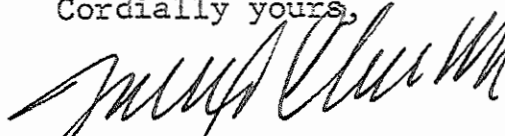
Honorable H.M. Hall  
Circuit Judge  
Bay Minette, Alabama

Case No. 3473  
Re: Reynolds Brothers  
vs: W. L. Lowery

Dear Judge:

Kindly render a judgment in this case based on an itemized statement of account in the amount of \$298.00 which includes \$24.62 interest.

Cordially yours,



FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TODAY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon W. T. LOWERY, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, against W. T. LOWERY, by REYNOLDS BROTHERS LUMBER CO, a partnership composed of J. P. REYNOLDS AND J. P. REYNOLDS.

Witness my hand this the 7 day of March, 1958.

Reisef. Duck  
Clerk

CC

COMPLAINT

REYNOLDS BROTHERS LUMBER CO.,	)	
a partnership composed of J. P.	)	
REYNOLDS AND M. S. REYNOLDS,	)	IN THE CIRCUIT COURT OF
	)	
PLAINTIFF,	)	BALDWIN COUNTY, ALABAMA
VS:	)	
	)	AT LAW
W. T. LOWERY,	)	
	)	
DEFENDANT	)	

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY THREE & 38/100 DOLLARS (\$273.38), due from him by account on, to wit: the 27th day of December, 1956, which sum of money, with interest thereon is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY THREE & 38/100 DOLLARS (\$273.38), due from him on account stated between the plaintiff and the defendant on, to wit: the 27th day of December, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY THREE & 38/100 DOLLARS (\$273.38), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 27th day of December, 1956, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 1st day of March, 1958.

Defendant's address is  
Foley, Alabama.

John P. Chas. 1142  
Attorney for Plaintiff

AFFIDAVIT OF J. P. REYNOLDS

THE STATE OF ALABAMA, )

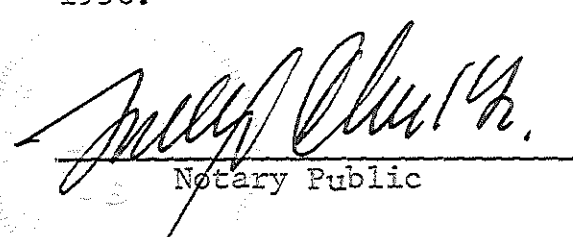
BALDWIN COUNTY. )

J. P. REYNOLDS, first being duly sworn, deposes and says as follows:

My name is J. P. Reynolds; I am a partner in REYNOLDS BROTHERS LUMBER CO., a partnership composed of J. P. REYNOLDS and M. S. REYNOLDS, Foley, Alabama; I know that W. T LOWERY owes REYNOLDS BROTHERS LUMBER CO. the sum of TWO HUNDRED SEVENTY THREE & 38/100 DOLLARS (\$273.38) after allowing all just credits.

  
J. P. Reynolds, Partner

Sworn to and subscribed  
before me, a Notary Public,  
this the 1st day of March,  
1958.

  
Notary Public

7 day of Mar. 1958  
and day of May 1958  
received a copy of the within. B.C.  
on W. T. Lowery

By service on  
TAYLOR WILKINS, Sheriff  
By *Charles* D. S.

Sheriff claims 22 miles at  
Ten Cents per mile Total \$ 2.20  
TAYLOR WILKINS, Sheriff  
BY *Charles*  
DEPUTY SHERIFF

7003473 RECORDED

SUMMONS AND COMPLAINT

REYNOLDS BROTHERS LUMBER CO.,  
A PARTNERSHIP COMPOSED OF  
J. P. REYNOLDS AND M. S.  
REYNOLDS

PLAINTIFF

VS

W. T. LOWERY,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 7 1958

*ALICE L. BUCK*

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

*Foley*

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

October 6, 1959

Hon. Taylor Wilkins, Sheriff  
Bay Minette, Alabama

Re: Reynolds Brothers Lumber Company  
vs: W. T. Lowery  
No. 3473½

Dear Taylor:

I am returning this garnishment without having it served, because I know that the debtor owes the bank on a note and should there be any funds in the bank, the bank would have the right to credit these funds on the past due note.

With best wishes, I am

Cordially yours,

A handwritten signature in dark ink, appearing to read "Forest A. Christian", with a stylized flourish at the end.

FOREST A. CHRISTIAN

COPY

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
FOLEY, ALABAMA

October 6, 1959

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Bay Minette, Alabama

Re: Reynolds Brothers Lumber Company  
vs: W. T. Lowery  
No. 3473½

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With best wishes, I am

Cordially yours,

  
FOREST A. CHRISTIAN

*Copy for Mrs. Duck*

**THE STATE OF ALABAMA,** {  
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, At a regular Term, 194 of the Circuit Court of Baldwin County,

to-wit: On the 7th day of June, 19458, being a regular day of

said term, REYNOLDS BROTHERS LUMBER COMPANY

recovered judgment against W.T. LOWERY

for the sum of Two Hundred Ninety-eight &amp; 00/100 Dollars, and cost of suit,

and affidavit having been made by Forest A. Christian  
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the  
following named persons or corporations, viz:

The Farmers &amp; Merchants Bank, Foley, Alabama

has or is believed to have in its possession, or under its control money

or effects belonging to said defendant 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

The Farmers &amp; Merchants Bank, Foley, Alabama

to be and appear before the honorable the Circuit Court for Baldwin County, at the Court House thereof, in  
the city of Bay Minette, on the Monday in A. D. 194then 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 answer, or at any time intervening the time of serv-  
ing the garnishment and making the answer was indebted to said defendantand whether it will not be indebted in future to said defendant  
by a contract then existing, and whether by a contract then existing itis, 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 W.T. Lowery

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

Witness, R. S. DUCK, Clerk of said Court, this 26 day of August

A. D., 19459 ISSUED day of A. D. 194

ATTEST:

*R. S. Duck*  
Clerk.

State of Alabama

BALDWIN COUNTY

TO W.T. LOWERY, Defendant

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

REYNOLDS BROTHERS LUMBER COMPANY, Plaintiff

versus W.T. LOWERY, Defendant

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

THE FARMERS &amp; MERCHANTS BANK, FOLEY, ALABAMA

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 26

day of August, 1945

*Alfred H. Hark*  
 Clerk of the Circuit Court.



State of Alabama  
BALDWIN COUNTY

TO W.T. LOWERY, Defendant:

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

REYNOLDS BROTHERS LUMBER COMPANY, Plaintiff,

versus W.T. LOWERY, Defendant,

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

THE FARMERS & MERCHANTS BANK, FOLEY, ALABAMA

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

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 26

day of August, 1959...

*Reed. Welch*  
Clerk of the Circuit Court.

THE STATE OF ALABAMA, {  
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

WHEREAS, At a regular Term, 194 of the Circuit Court of Baldwin County,

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or effects belonging to said defendant 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  
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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 W.T. Lowery

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

Witness, ROSE DUCK, Clerk of said Court, this 26 day of August  
ALICE J.

A. D., 19459. ISSUED day of A. D. 194

ATTEST:

165

*Alice J. Duck* Clerk.

AFFIDAVIT ON JUDGMENT

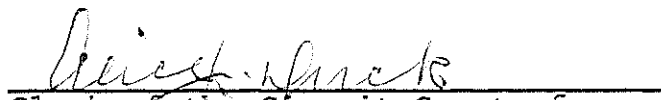
THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

Personally appeared before me, ALICE J. DUCK, Clerk of the Circuit Court in and for said County FOREST A. CHRISTIAN, who being duly sworn, deposes and saith that REYNOLDS BROTHERS LUMBER COMPANY on June 7, 1958, A.D., in the Circuit Court of Baldwin County recovered a judgment against W. T. LOWERY for the sum of TWO HUNDRED NINETY-EIGHT & 00/100 DOLLARS (\$298.00) and the further sum of TWENTY-ONE & 85/100 DOLLARS (\$21.85) cost of court, and that he believes the process of garnishment is necessary to obtain satisfaction of said judgment, and that the Farmers & Merchants Bank, Foley, Alabama has or is believed to have in its possession or under its control, money or effects belonging to the defendant, or that has or is believed to be indebted to the defendant, or is 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.



Sworn to and subscribed before me this 26th day of August, 1959.

  
Clerk of the Circuit Court of  
Baldwin County.