

4035

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. N. MINCHEW to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of GEORGE POOS, Operating under the name and style of R. & R. Service Shop.

Witness my hand this the 2 day of November, 1959.

Alice J. Luck
Clerk, Circuit Court, Baldwin County,
Alabama.

- - - - -

GEORGE POOS, operating under
the name and style of R. & R.
Service Shop,
Plaintiff,

vs

J. N. MINCHEW,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FIRST:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY SEVEN & 36/100 (\$327.36) DOLLARS, due from him by account on the 1st day of May, 1959, which sum of money with interest thereon, is still unpaid.

SECOND:

The Plaintiff claims of the Defensant the sum of THREE HUNDRED TWENTY SEVEN & 36/100 (\$327.36) DOLLARS, on account stated between the Plaintiff and the Defendant on the 1st day of May, 1959, which sum of money with interest thereon, is still unpaid.


THIRD:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY SEVEN & 36/100 (\$327.36) DOLLARS, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit: the 7th day of February, 1959, which sum of money with interest thereon, is still unpaid.

FOURTH:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY SEVEN & 36/100 (\$327.36) DOLLARS, for work and labor done for the Defendant by the Plaintiff on to-wit: February 14th, 1959, at his request, which sum of money with interest thereon, is still unpaid.

FILED
NOV 2 1959
ALICE J. DUCK, Clerk


Attorney for Plaintiff

4035

GEORGE POOS, operating
under the name and style
of R. & R. Service Shop,

Plaintiff,

vs

J. N. MINCHEW,

Defendant.

Summon and Complaint

FILED

NOV 2 1959

ALICE J. DUCK, Clerk

JOHN P. BEEBE

ATTORNEY AT LAW

ROBERTSDALE, ALABAMA

Received 2 day of Nov 1959
and on 7 day of Jan 1960
served a copy of the within
on J. N. Minchew
by service on _____

TAYLOR WILKINS, Sheriff

Summons

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

State of Alabama

BALDWIN COUNTY

TO J.N. MINCHEW, Defendant:

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

GEORGE POOS, Plaintiff,

versus J.N. MINCHEW, Defendant,

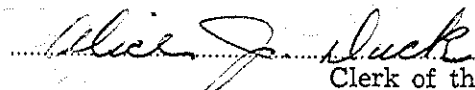
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

RAY E. LOPER LUMBER COMPANY, INC., BAY MINETTE, ALABAMA

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 15

day of August, 1960.


Clerk of the Circuit Court.

4035 $\frac{1}{2}$

Live in marlow

ived 15 day of Aug 65
on 9 day of Sept 65
ved a copy of the within Notar
J. N. Minchew
ervice on

TAYLOR WILKINS, Sheriff
By Carlisle Wilkins
Joley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF

NOTICE
TO DEFENDANT OF GARNISHMENT

BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO
GEORGE POOS

Plaintiff.....

VS.

J. N. MINCHEW

Defendant.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid John P. Beebe, Attorney of record for George Poos, operating under name and style of R. & R. Service Shop, Plaintiff, who being duly sworn, on oath says, that a regular

Term of the Circuit Court of Baldwin County, to-wit: on the 25th day of February 1960, George Poos, operating under the name and style of R. & R. Service Shop, Plaintiff, recovered a judgment against J. N. Minchew, Defendant,

for the sum of THREE HUNDRED FORTY TWO & 12/100 (\$342.12) Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that Ray E. Loper Lumber Company, Inc. Bay Minette, Alabama, is

supposed to be indebted to or have effects of the said J. N. Minchew in its possession, or under its control, and that he believes process of Garnishment against said Ray E. Loper Lumber Company, Inc., is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 15 day of May A. D. 1960
Alice J. Duck
Clerk.

John P. Beebe
Attorney of Record for
Plaintiff.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid John P. Beebe, Attorney of record for George Poos, operating under name and style of R. & R. Service Shop, Plaintiff, who being duly sworn, on oath says, that a regular _____ Term of the Circuit Court of Baldwin County, to-wit: on the 25th day of February 1960, George Poos, operating under the name and style of R. & R. Service Shop, Plaintiff, recovered a judgment against J. N. Minchew, Defendant,

_____ for the sum of THREE HUNDRED FORTY TWO & 12/100 (\$342.12) Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that Ray E. Loper Lumber Company, Inc., Bay Minette, Alabama, is

_____ J. N. Minchew supposed to be indebted to or have effects of the said _____ in its possession, or under its control, and that he believes process of Garnishment against said Ray E. Loper Lumber Company, Inc., is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this 15 day of February A. D. 1960
Alice J. Duck
Clerk.

John P. Beebe
Attorney of Record for
Plaintiff.

NO. 4035 $\frac{1}{2}$

CIRCUIT COURT

George Poos, operating
under name and style of R.
& R. Service Shop,
Plaintiff,

vs.

J. N. Minchew,
Defendant.

AFFIDAVIT

Garnishment on Judgment

Filed this _____ day of _____

19____

Clerk.

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 25th day of February, 1960, being a regular day of
said term, George Poos, operating under the name and style of R. & R.
Service Shop, Plaintiff,
recovered judgment against J. N. Minchew, Defendant,

for the sum of Three Hundred Forty Two & 12/100 (\$342.12) Dollars, and cost of suit,
and affidavit having been made by John P. Beebe, Attorney of record for Plaintiff,
that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the
following named persons or corporations, viz:

Ray E. Loper Lumber Company, Inc., Bay Minette, Alabama,

has or is believed to have in its possession, or under its control money
or effects belonging to said defendant J. N. Minchew or that it is, or
is believed to be indebted to said defendant or to be liable to him, 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

Ray E. Loper Lumber Company, Inc., Bay Minette, Ala-
bama,

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 serv-
ing the garnishment, and making the answer its was so indebted to said defendant
J. N. Minchew and whether it will not be indebted in future to said defendant
by a contract then existing, and whether by a contract then existing it
is, or are, liable to said defendant 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 J. N. Minchew

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

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

Issued 15 day of Aug A. D., 1960

ATTEST:

Alice J. Duck Clerk.

Received 15 day of Aug 1960
and on 16 day of Aug 1960
I served a copy of the within Writ
on Ray E. Spurr & Sons
By service on Jock Luddith

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.
J. M.

Circuit Court, Baldwin County

No. 4035 1/2

George Poore

VS. } Garnishment On Judgment

J. D. Minchew

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

Attorney

GEORGE POOS, operating under the
name and style of R. & R. Service
Shop,

Plaintiff,

VS.

J. N. MINCHEW,

Defendant,

RAY E. LOPER LUMBER COMPANY, INC.,

Garnishee.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Now comes Ray E. Loper Lumber Company, Inc., a corporation,
the garnishee named in this cause, and for answer to the writ of
Garnishment served on it in this cause, says:

1. It is now indebted to the defendant in the amount of
\$11.04, and will be indebted to the defendant in the future by an oral
contract now in existence, the termination date of which is in-
definite.

Having fully answered the said writ of Garnishment, the
garnishee prays that it be discharged with its reasonable costs in
this behalf expended.

RAY E. LOPER LUMBER COMPANY, INC.

By

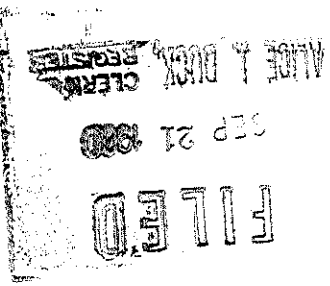
As its President

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said
County in said State, personally appeared Ray E. Loper, who, after
being by me first duly and legally sworn, deposes and says: That
he is President of Ray E. Loper Lumber Company, Inc., an Alabama
corporation, and that the facts stated in the foregoing answer are
true.

Sworn to and subscribed before me
on this the 23rd day of August, 1960.

Notary Public, Baldwin County, Alabama



41 35 1/2
ANSWER OF GARNISHEE

GEORGE POOS, operating under the
name and style of R. & R. Service
Shop,

vs.

Plaintiff,

J. N. MINCHEW,

Defendant,

RAY E. LOPER LUMBER COMPANY, INC.,

Garnishee.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
SEP 21 1960
AUG 1 1960
CLERK
REGISTER

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

August 12th, 1960.

Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Re: George Poos, operating., etc vs. Minchew:
Civil Suit No. 4035

Dear Mr. Duck:

I enclose my affidavit and duplicate copies of garnishment
on judgment in the matter of the above named suit.

If you will accept my signature to the affidavit as genuine
and file the writ of garnishment and place the same in the hands of
the Sheriff for service I will greatly appreciate your kindness.

Sincerely yours,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".