

J. L. MOTHERSHEAD and	Y		
G. F. STEVENSON,	Y		
	Y	IN THE CIRCUIT COURT OF	
Plaintiffs,	Y		
	Y		
vs.	Y	BALDWIN COUNTY, ALABAMA	
	Y		
A. C. TOLBOT,	Y	AT LAW	NO. 41082
	Y		
Defendant.	Y		

The undersigned, A. C. Talbot, the Defendant in the above styled cause, files this his statement in writing under oath, in accordance with a notice duly served upon him, setting out all of his assets, including money, choses in action, notes, bonds, accounts and all other property, real, personal or mixed or any interest therein, together with the location and reasonable value of each item thereof and also together with a statement of any liens mortgages or encumbrances thereon.

Such assets are as follows:

1. Real property. Lot 2, Block 49, Hand Land Company's Addition to Bay Minette, Alabama together with the home located thereon, which property is owned and occupied as a dwelling by the undersigned and Mary E. Talbot, his wife. The undivided one-half interest of the undersigned would have a reasonable market value of approximately Three Thousand Dollars (\$3,000.00) and there is a mortgage to The Baldwin County Savings and Loan Association on such property and there is now due the sum of Four Thousand One Hundred Sixty-Seven Dollars and Sixty-eight Cents (\$4,167.68) with interest. The undersigned is also the owner of a lot in the Bay Minette Cemetery. The market value of which is unknown.

2. Cash on hand \$ 5.00  
 Personal clothing 100.00  
 Accounts due undersigned:

Reuben Jackson	\$ 20.95	Jack Chandler	\$ 13.00
Virgil Stewart	16.60	Dr. T. C. Davis	16.00
Otis Wiggins	107.94	Fred Dempsey	3.75
Eria Lee Harville	11.00	Elba Milling Co.	1.50
Charlie Snowden	11.29	Cleve Haytt	28.10
J. S. Sanks	17.75	Jack McKenzie	3.25
C. M. Phillips	50.44	Bill Hyde	29.80
Jimmy Atchison	15.03	E. C. Johnson	223.37
Everett Biggs	63.39	Jones Feed Store	12.30
R. F. Boyington	24.00	Pete Knowles	98.00
H. L. Boyington	1.55	S. Kahalley Store	21.56
Forrest Burkett	17.00	Joe Lynd	3.00

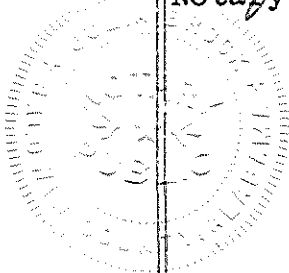
Harris Bryant	\$ 2.30	R. J. Lancaster	\$ 29.12
Chas. Cook	19.85	Bobby Mixon	19.75
J. N. Cowart	2.00	Sharon Mixon	5.92
Mrs. James Davidson	17.73	Ollie Presley	15.00
V. Dorman	1.45	Lawrence White	15.00
J. H. Eddins	.45	Virgil Rhodes	3.20
A. Flowers	2.00	Jim Ridgeway	8.37
Hubert Harville	3.00	W. D. Rider	48.60
D. H. Harville	31.45	John Stafford	4.65
George Johnson	11.47	C. LeNoir Thompson	49.75
Alf Mimms	28.95	T. W. Trawick	41.12
Frank Mason, Sr.	3.60	Eddie Foster	750.00
Henry Moorner	2.00	Nellie Byrd	15.75
Frank Mason, Jr.	140.00	Pat Stewart	13.39
Roosevelt Moore	.80	J.H. Green (Deceased)	119.00
Frank Moseley	6.05	Henry Bishop	81.56
Chas. Monroe	.90	O. T. Cox	32.38
Allen Mason	342.34	James Odom	4.75
Bay Minette Auto Parts	7.00	Fred Postmas	5.55
John Lancaster	25.00	Harry Pleasant	.80
Chas. Parker	179.53	Geo. Rabon	37.78
Bishop Palmer	10.49	C. L. Stacey	8.00
Melvin Stewart	5.00	F. W. Taylor	1.98
E. O. S. White	2.00	John Weaver	6.45
George Williams	3.55	Mrs. W. G. Beatty	15.00
Canal Cafe	25.00	J. T. McBride	20.00

3. The undersigned is indebted to The First National Bank of Bay Minette in the sum of Two Hundred and Forty Dollars (\$240.00) with interest on a note executed by him; is indebted to the Baldwin County Bank of Bay Minette, Alabama in the sum of Two Thousand Four Hundred Fifty-six Dollars and Eight-seven Cents (\$2,456.87) with interest from December 31, 1958 on a note executed by him; is indebted to the Baldwin County Bank of Bay Minette, Alabama in the sum of One Hundred and Twelve Dollars (\$112.00) with interest from May 23, 1959 on a note executed by him.

*A C Talbot*  
A. C. Talbot

Sworn to and subscribed before me  
on this the 21<sup>st</sup> day of July, 1961.

*Julia Brock*  
Notary Public, Baldwin County, Alabama.



NOTICE TO DEFENDANT

J. L. MOTHERSHEAD and  
G. F. STEVENSON

Plaintiffs

vs

A. C. TALBOT

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

TO: A. C. Talbot:

Take notice that upon the written request of C. LeNoir Thompson, attorney for the Plaintiffs, filed in this Court in this cause, you are commanded to file in this Court within thirty days from the service of this notice a statement in writing, under oath, of all of your assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal or mixed or any interest therein, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

Dated this 10 day of July, 1961.

Reice J. Duck  
Clerk of the Circuit Court.  
Baldwin County, Alabama

STATE OF ALABAMA

COUNTY OF BALDWIN

IN THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to serve a copy of the above notice upon A. C. Talbot, and make due return thereon, according to law.

Witness my hand this the 10 day of July, 1961.

Reice J. Duck  
Clerk, Circuit Court of  
Baldwin County, Alabama

4083

J. L. Mothershead  
H. F. Stevenson  
vs.  
R. C. Talbot

Received 10 day of July 1961  
and on 12 day of April 1961  
I served a copy of the within Notice  
on R. C. Talbot

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By H. F. Stevenson D. S.

J. L. MOTHERSHEAD and  
G. F. STEVENSON

Plaintiffs

vs

A. C. TALBOT

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

WRIT OF DISCOVERY

The plaintiffs herein having recovered on the 19th day of January, 1960, a judgment against the defendant in the above styled cause for the sum of Six Thousand Two Hundred Sixty-seven and 70/100 (\$6,267.70) Dollars and costs in the sum of Twenty-six (\$26.00) Dollars, and such execution having been returned endorsed by the sheriff of Baldwin County, Alabama, "no property found", the plaintiffs now request in writing that the Clerk of this Court will issue a notice to the above named defendant, requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character, and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

THOMPSON & WHITE

BY: 

Attorneys for plaintiffs

J. L. MOTHERSHEAD AND  
G. F. STEVENSON

PLAINTIFFS

VS

A. C. TALBOT

DEFENDANT

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW.

X

X

X

-1-

The Plaintiffs claim of the Defendant Five Thousand Ninety-six and 31/100 (\$5096.31) Dollars due by promissory waive note made by him on the 8th day of January, 1958, and payable on the 8th day of January 1959, with interest thereon.

-2-

The Plaintiffs claim of the Defendant a reasonable attorney fee as provided in the said promissory waive note.

THOMPSON & WHITE

FILED

DEC 1 1959

ALICE J. DUCK, Clerk

BY:

*[Signature]*  
Attorneys for the Plaintiff

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon A. C. TALBOT

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, State of Alabama, at Bay Minette, against-----

A. C. TALBOT

-----, Defendant-----

by-----

J. L. MOTHERSHEAD AND G. F. STEVENSON

-----, Plaintiffs-----

Witness my hand this

1st day of

Dec. 1959

122

Alice J. Luck, Clerk

Ex 12-5-59

No. 4083

Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

J. L. MOTHERSHEAD

G. F. STEVENSON

Plaintiffs

vs.

A. C. TALBOT

Defendants

Summons and Complaint

Filed

**FILED**

19

DEC 1 1959

ALICE J. DUCK, Clerk

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

12/11 1959

\_\_\_\_\_, Sheriff

I have executed this summons

this

Dec 5 1959

by leaving a copy with

A. C. Talbot

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

o m



J. L. MOTHERSHEAD and  
G. F. STEVENSON

plaintiffs

vs

A. C. TALBOT

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4083

WRIT OF DISCOVERY

The plaintiffs herein having recovered on the 19th day of January, 1960, a judgment against the defendant in the above styled cause for the sum of Six Thousand Two Hundred Sixty-seven and 70/100 (\$6,267.70) Dollars and costs in the sum of Twenty-six (\$26.00) Dollars, and such execution having been returned endorsed by the sheriff of Baldwin County, Alabama, "no property found", the plaintiffs now request in writing that the Clerk of this Court will issue a notice to the above named defendant, requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character, and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

THOMPSON & WHITE

BY

*LeDora Thompson*  
Attorneys for plaintiffs

FILED

JUL 10 1961

ALICE J. DUCK, CLERK  
REGISTER

P. 122-17

J.L. MOTHERSHEED AND  
G.F. STEVENSON,

Plaintiffs,

VS.

A.C. TALBOT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. \_\_\_\_\_.

Now comes L.L. Malone, doing business as Malone Pontiac Motors, and files this his answer to the garnishment on the judgment, he being named in said garnishment as Garnishee:

1. The said L.L. Malone says that the said A.C. Talbot is presently in his employment; that he does not pay the said A.C. Talbot a salary and accordingly, there is no sum owed by him to A.C. Talbot under any contract of employment or otherwise as regular salary.

2. The said L.L. Malone alleges that the said A.C. Talbot is employed by the said L.L. Malone as an automobile salesman on a commission basis. That at the time of the filing of this answer that he is in no wise indebted to the said A.C. Talbot for commissions or otherwise. That if the said A.C. Talbot continues to work for him on a commission basis, the said L.L. Malone might sometimes in the future be indebted to the said A.C. Talbot in an amount unknown, and depending entirely upon the automobile sold by the said A.C. Talbot.

FILED  
AUG 17 1960  
ALICE J. DUCK, CLERK  
REGISTER

*J. Cannon Owens, Jr.*  
Attorney for Garnishee

4083 1/2

FILED  
AUG 17 1960  
ALICE J. DUCK, CLERK  
REGISTER

State of Alabama  
BALDWIN COUNTY

TO ....., Defendant.....:

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

....., Plaintiff.....,

versus ....., Defendant.....,

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

ha..... been named as Garnishee.....

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

day of ....., 194.....

.....  
Clerk of the Circuit Court.

State of Alabama

BALDWIN COUNTY

TO A. C. Talbot, Defendant:

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

J. L. MOTHERSHED AND G. F. STEVENSON, Plaintiff,versus A. C. TALBOT, Defendant,

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

L. L. MALONE d/b/a MALONE PONTIAC MOTORS

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the.....4th..

day of August, 19460

Alice J. Duck  
Clerk of the Circuit Court

000000

**0689** **0701** **0702** **0703**

[illegible]

**Figure 1** The effect of the  $\alpha$ -factor on the  $\beta$ -factor. The  $\beta$ -factor is plotted against the  $\alpha$ -factor for the three cases. The  $\beta$ -factor is always less than 1, and decreases as the  $\alpha$ -factor increases. The  $\beta$ -factor is highest for the case of  $\alpha = 0$  and lowest for the case of  $\alpha = 1$ .

Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was plotted against the number of trials for each participant. The number of correct responses increased with the number of trials, and the increase was more pronounced for the group with a higher number of correct responses.

NOA. RETURNED TO THE OFFICE OF THE SECRETARY OF THE ARMY, WASHINGTON, D.C. 20315

NOTICE  
TO DEFENDANT OF GARNISHMENT  
BY  
CLERK OF CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA  
TO

Plaintiff.....

VS.

Defendant.....

Dec 29 5 09 PM '08

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 C. LeNoir Thompson, attorney for J. L. Mothershead & G. F. Stevenson who being duly sworn, on oath says, that a regular \_\_\_\_\_ Term of the Circuit Court of Baldwin County, to-wit: on the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_, J. L. Mothershead and G. F. Stevenson recovered a judgment against A. C. Talbot \_\_\_\_\_ for the sum of Six Thousand Two Hundred Sixty-seven and 70/100 (\$6,267.70) Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that L. L. Malone, d/b/a Malone Pontiac Motors \_\_\_\_\_ supposed to be indebted to or have effects of the said A. C. Talbot \_\_\_\_\_ in his \_\_\_\_\_ possession, or under his \_\_\_\_\_ control, and that he believes process of Garnishment against said L. L. Malone, d/b/a Malone Pontiac Motors \_\_\_\_\_ is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this \_\_\_\_\_ day of \_\_\_\_\_ A. D. 19\_\_\_\_

*C. LeNoir Thompson*

NO.

4083 1/2

CIRCUIT COURT

VS.

AFFIDAVIT

Garnishment on Judgment

Filed this

RECEIVED

day of

AUG 4 1960, 19

ALICE J. DUCK

CLERK  
REGISTER

Clerk.



**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 \_\_\_\_\_ day of \_\_\_\_\_, 194—, being a regular day of

said term, J. L. Mothershead and G. F. Stevensonrecovered judgment against A. C. Talbotfor the sum of Six Thousand Two Hundred Sixty-seven & 70/100 Dollars, and cost of suit,and affidavit having been made by C. LeNoir Thompson, attorney for said 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:L. L. Malone, d/b/a Malone Pontiac Motorshas or is believed to have in his possession, or under his control moneyor effects belonging to said defendant \_\_\_\_\_ or that he 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 \_\_\_\_\_

L. L. Malone, d/b/a Malone Pontiac Motors

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. 194—,

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 his answer, or at any time intervening the time of serv-ing the garnishment and making the answer he was \_\_\_\_\_ indebted to said defendantand whether he will not be indebted in future to said defendant

\$ 5,441.23

Bay Minette, Ala.

Jan. 8, 1958.

On the 8 day of January, 1959, for value received I promise to pay to ~~BALDWIN COUNTY BANK~~ J.L. Mothershead G.F. Stevenson, Five Thousand Four Hundred Forty One & 23/100 DOLLARS.

at the BALDWIN COUNTY BANK, Bay Minette, Ala. And hereby waive all right of exemption as to personal property against the payment of this debt and cost of collection, under the laws of Alabama, and agree to pay all expenses in counsel fees, or otherwise, that may accrue in the collection of this debt, and makers, sureties and endorsers hereby severally waive presentment, protest and consent that time of payment may be extended without notice thereof. The bank at which this note is payable is hereby authorized to apply on or after maturity, to the payment of this debt any funds in said bank belonging to the maker, surety, endorser, guarantor, or any one of them.

And to better secure the above note, and any other amounts either of us now owe or may owe to ~~BALDWIN COUNTY BANK~~ J.L. Mothershead & G.F. Stevenson, at or before the payment of this note, I hereby grant, bargain, sell and convey to BALDWIN COUNTY BANK, of Bay Minette, Ala., the following property, to-wit:

All of my live stock, and other personal property, including all our household and kitchen furniture of every kind and character, our entire crop, of every kind and description, raised during the year 1958 by us or under our direction, including all rents due or to become due us for the year 19 in Baldwin County, Alabama, or elsewhere. Also

In case we fail to pay this note, or any debt secured hereby, when due, or should we sell or dispose of, remove, abandon, mistreat or injure any of the above mentioned property without the consent of BALDWIN COUNTY BANK, Bay Minette, Ala., then the entire debts secured herein shall become due and payable to BALDWIN COUNTY BANK, Bay Minette, Ala., and they may seize, take possession of, and sell any or all of said property at public outcry for cash, to the highest bidder, at Bay Minette, Ala., after advertising the same for one day, by posting one written notice on the front of the place of business of BALDWIN COUNTY BANK, Bay Minette, Ala., and in case of a sale under this contract it is hereby authorized to bid for and become the purchaser of said

property. I do hereby certify that all of the above property is free from all liens and incumbrance and we are 21 years of age and have a good right to make this conveyance of it.

Attest:

*A. C. Talbot* L. S.

No. Due

L. S.

2  
A.C. Talbot

12-8-58

J.L. Mothershead  
G.F. Stevenson

Each endorser, whose name appears below hereby waives all his right of exemption, and also waives presentment for payment, protest and notice of protest and non-payment of within note, and agrees that said endorsement shall remain good and binding until said note is fully paid.

STATE OF ALABAMA BALDWIN COUNTY  
6-7-58 9:PM

Filed mtg book 295 page 571  
Recorded mtg and I certify that the following Privilege Tax has been paid.

Deed Tax

Mortgage Tax

8/25  
W.R. Stewart  
Judge of Probate  
By NS

M- 8.25  
R- 45  
8 70

Geo. Stevenson

B.M.

\_\_\_\_\_ by a contract then existing, and whether by a contract then existing he  
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 he has not in his possession or under his control money or  
effects belonging to the defendant A. C. Talbot

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

<sup>ALICE J.</sup>  
Witness, ~~R.R.~~ S. DUCK, Clerk of said Court, this 4 day of Aug

A. D., 194\_\_\_\_. ISSUED\_\_\_\_ day of\_\_\_\_ A. D. 194ed

ATTEST:

169

Wm. S. Duck Clerk.