

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Marion Howard Purvis 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 Arnold L. Chandler, Jr.

Witness my hand, this 9 day of June, 1961.

Reice J. Rouse
Clerk,

ARNOLD L. CHANDLER, JR.

PLAINTIFF

VS

MARION HOWARD PURVIS

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4540

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW:

1.

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED DOLLARS (\$1,200.00) as damages for that heretofore on to-wit, the 12th day of November, 1960, the automobile of the Plaintiff was being driven upon or along U. S. Highways #90 and 98, a public highway in Baldwin County, Alabama, at or near the point where the said highways intersect with U. S. Highway #98, at said time and place the Defendant so negligently operated his motor vehicle as to cause or allow the same to run into, upon or against the automobile of the Plaintiff. As a direct, proximate consequence and result of the negligence of the Defendant the Plaintiff's automobile was damaged as follows: the left front fender was crushed, the entire front bumper was twisted and bent, the radiator was bent and punctured, the left side of the car was scraped and scarred and the frame of the car was warped and twisted, all to the loss of the Plaintiff in the aforesaid amount.

2.

The Plaintiff claims of the Defendant the sum of TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00) as damages for that heretofore on, to-wit, the 12th day of November, 1960, at or near a point where U. S. Highway #90 and 31 intersects with U. S. Highway #98, public highways in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle at said time and place as to cause or allow the same to run into or collide with the motor vehicle which the Plaintiff was driving and as a proximate consequence and result of the negligence of the Defendant aforesaid, the Plaintiff was injured in this, he was bruised about his body, his back was injured and he was otherwise caused to suffer great pain and anguish, he was caused to loose time from his work and to incurr medical expenses in and about the treatment of his injuries, all to his damages of aforesaid, wherefore the Plaintiff brings this suit and ask judgment in the above amount.

WILTERS, BRANTLEY & NESBIT

BY: 

Defendant's address is:
16 South Fairpoint Street
Chickasaw, Alabama

FILED

JAN 9 1961

ALICE J. DUCK, CLERK
REGISTER

EXECUTED
This 26 day of Jan, 1961
by serving a copy of the within on
Marion Howard Purvis
RAY D. BRIDGES, Sheriff
By B. F. Harris D.B.

2799
NO. 14546
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ARNOLD L. CHANDLER, JR.
PLAINTIFF
261/10 VS
MARION HOWARD PURVIS
DEFENDANT

FILED
JAN 9 1961
ALICE L. DUCK, CLERK
REGISTER

RECEIVED
JAN 10 1960
SHERIFF'S OFFICE

WILTERS, BRANTLEY & NESBIT
Attorneys at Law
Robertsdale, Alabama

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. MCCORVEY
BEN D. TURNER
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES L. MAY, JR.
ALEX T. HOWARD, JR.
J. JEPHTHA HILL
CHARLES B. BAILEY, JR.
C. M. A. ROGERS, III

October 31, 1961

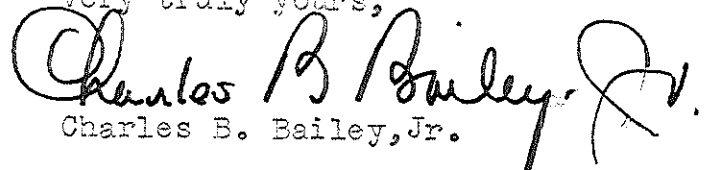
Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Arnold Chandler, Jr. vs.
Marion Howard Purvis

Dear Mrs. Duck:

We enclose herewith affidavit for institution
of garnishment proceedings in the above and would appre-
ciate your issuing the appropriate writ in connection
therewith.

Very truly yours,


Charles B. Bailey, Jr.

CBBjr/nmt

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 day of , 19, being a regular day of
said term,

Arnold Chandler, Jr.,

recovered judgment against Marion Howard Purvis

for the sum of Three Thousand, Five Hundred and no/100 Dollars, and cost of suit,
and affidavit having been made by Charles B. Bailey, Jr., Attorney 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:

Mobile Roofing and Construction Co., Inc., a Corp.

4 North Dearborn St., Mobile,

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 Mobile Roofing and Construction
Co., Inc., a Corp.

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 it was indebted to said defendant
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 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 Marion Howard Purvis

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

Witness, ALICE J. DUCK, Clerk of said Court, this 1st day of November, A. D., 1961.

Issued 1st day of Nov. A. D., 1961.

ATTEST:

Alice J. Duck, Clerk.

4/R8 7958
Circuit Court, Baldwin County

No. 4540½

ARNOLD CHANDLER, JR.

VS. } Garnishment On Judgment

MARION HOWARD PURVIS

127
R8
Earl Kramer, Jr. Pres.
Issued 1st day of Nov. 19 61

Returnable day of 19

RECEIVED

NOV 6 1961

SHERIFF'S OFFICE

Charles B. Bailey, Jr.

9th Floor Merchants National Bank Bldg.
Mobile 6, Ala. Attorney

Received 6 Day of November 1961
and on 15
I served a copy of this writ on
or Mobile Trucking & Corp.
Company, President
by service of
Earl Kramer, Jr.
RAY D. DEDMON, SHERIFF
BY R. Rogers, S.

Answer of Garnishee

STATE OF ALABAMA }
COUNTY OF MOBILE }
BALDWIN

BALDWIN
IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

Arnold Chandler, Jr., Plaintiff

VS. No. 4540 1/2

Marion Howard Purvis, Defendant

And now, on this day, comes Mobile Roofing & Construction Co.

Garnishee in the above stated cause, and for answer to the writ of Garnishment served upon it

on the day of , 1961

upon oath, says that it was not indebted

to the above named Defendant at the time of the service of the writ of Garnishment in the above stated

cause, or at the time of making its answer hereto; and that it will

not be indebted in the future to the said Defendant by a contract then existing, or at the time of

this summons; and that it has not in its

possession, or under its control, personal or real property, or things in action

belonging to the said defendant.

Defendant no longer employed by us

And, Garnishee having fully answered, prays to be discharged with reasonable costs in this behalf expended.

Subscribed and sworn to before me, this 16th day of November, 1961.

FILED

NOV 18 1961

ALICE J. DUCK, CLERK
REGISTERED

Notary Public, Mobile County, Alabama

No. 4540 1/2

BALDWIN

Circuit Court, Mobile County

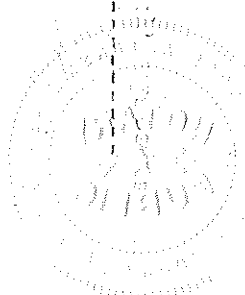
Arnold Chandler, Jr.

VS. Answer of Garnishee

Marion Howard Purvis

Filed _____ day of _____, 19____

Clerk



State of Alabama

BALDWIN COUNTY

TO Marion Howard Purvis, Defendant:

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

Arnold Chander, Jr., Plaintiff,

versus Marion Howard Purvis, Defendant,

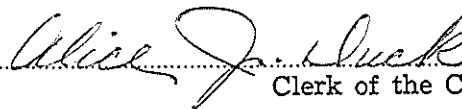
now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

Mobile Roofing and Construction Co., Inc., a Corp.

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 1st

day of 22 November, 1961.



Clerk of the Circuit Court.

NOTICE
TO DEFENDANT OF GARNISHMENT

BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

61
914

MARION HOWARD PURVIS,
Defendant.
15 Fairport, Chichasaw, Ala.

ARNOLD CHANDLER, JR.,

Plaintiff.....

VS.

MARION HOWARD PURVIS

Defendant.....

EXECUTED

This 6 day of Dec, 19 61

by serving a copy of the within on

Marion Howard Purvis

RAY D. BRIDGES, Sheriff

By B. F. Harris D.E.

ARNOLD CHANDLER, JR.,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	*	AT LAW
MARION HOWARD PURVIS,	*	NO. <u>4549 1/2</u>
Defendant.	*	

G A R N I S H M E N T

Before me the undersigned authority personally appeared Charles B. Bailey, Jr., one of the attorneys for the plaintiff in the above styled cause, who made oath in due form of law that Arnold Chandler, Jr. hath obtained judgment against Marion Howard Purvis for Three Thousand Five Hundred and No/100 (\$3,500.00) Dollars beside costs of suit before the Circuit Court of Baldwin County, Alabama, and that Mobile Roofing and Construction Company, Inc., a corporation, is supposed to be indebted to or have effects of the said Marion Howard Purvis in its possession or under its control and that he believes process of garnishment is necessary against the said Mobile Roofing and Construction Company, Inc. to obtain satisfaction of said judgment.

Charles B. Bailey, Jr.
Charles B. Bailey, Jr.

Sworn to and subscribed before me this 31st day of October, 1961.

[Signature]
Notary Public

Defendant's address:
15 Fairport
Chickasaw, Alabama

Garnishee's address:
4 North Dearborn Street
Mobile, Alabama