

JNO S. HUFFMAN, Individually
and doing business as JNO S.
HUFFMAN INSURANCE AGENCY

Plaintiff

VS

LOUIS CARNLEY

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him by account on to-wit the 30th day of November, 1959; which sum of money with interest thereon is still unpaid.

COUNT II


The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him by account for insurance sold by the Plaintiff to the Defendant on, to-wit; between the 18th day of August, 1958 and November 30th, 1959; which sum of money with the interest thereon is still unpaid.

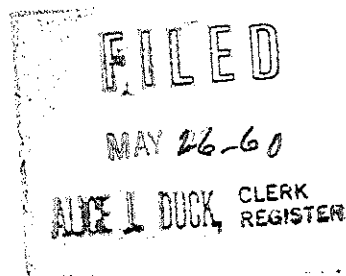
COUNT III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 30th day of November, 1959; which sum of money with interest thereon is still unpaid.


Attorney for the Plaintiff

Note: The account sued on is evidenced by an itemized and
verified statement of account, filed herewith.


Attorney for the Plaintiff



FIDELITY-PHENIX
INSURANCE COMPANY
(FORMERLY THE METROPOLITAN CASUALTY INSURANCE COMPANY OF NEW YORK)

JNO. S. HUFFMAN INS. AGENCY

225 Fairhope Avenue

FAIRHOPE, ALA.

Telephone WA 8-2163

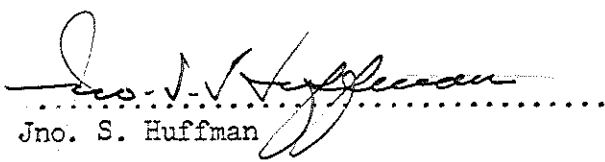
May 6, 1960

Louis Carnley

Statement of Outstanding Accounts

| | Debit | Credit | Balance |
|---|--------|--------|---------|
| Audit on Last Year's W. C. and MFG.: | | | |
| C-262459 8-18-58 to 8-18-59 Catholic Church on Sec.St. | 98.18 | | 98.18 |
| MCS-80148 8-18-58 to 8-18-59 " " " " " | 14.73 | | 112.91 |
| This Year's Policies: | | | |
| C-307064 8-18-59 to 8-18-60 Req. for hospital job | 197.14 | | 310.05 |
| MCS-89382 8-18-59 to 8-18-60 " " " " " | 55.24 | | 365.29 |
| Return Premium due to cancellation of above: | | | |
| C-307064 8-18-59 to 11-30-59 | | 106.44 | 258.85 |
| MCS-89392 8-18-59 to 11-30-59 | | 29.55 | 229.30 |
| Less Return Premium by cancellation of truck liability policy | | 34.99 | 194.31 |

The above bill is true and correct and has not been paid.


Jno. S. Huffman

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, personally appeared JNO S. HUFFMAN, who, being duly sworn, deposes and says that he is Owner of the JNO S. HUFFMAN INSURANCE AGENCY, the owner of the attached account, and that the attached account is correct statement of account between LOUIS CARNLEY AND JNO S. HUFFMAN INSURANCE AGENCY, and that there is owing from the said LOUIS CARNLEY to the said, JNO S. HUFFMAN, Individually, and doing business as JNO S. HUFFMAN INSURANCE AGENCY, the sum of ONE HUNDRED NINETY FOUR and 31/100 Dollars (\$194.31), with interest from 30 of Nov, 1959.

Jno S. Huffman
AFFIANT

Subscribed and sworn to before me this the 25 day of May, 1960.

[Signature]
Notary Public, Baldwin County, Ala.

SUMMONS AND COMPLAINT

Moore Ptg. 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 Louis Carnley

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 _____

_____ Louis Carnley _____, Defendant.

by ~~Jno. Huffman, Individually and d/b/a Jno Huffman Insurance Agency~~ _____

_____, Plaintiff.

Witness my hand this 26th day of May 19 60

W. J. D. Smith, Clerk

State of Alabama

BALDWIN COUNTY

TO LOUIS CARNLEY, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of JNO.....
 S. HURFMAN, Individually a/d/b/a JNO S. HURFMAN INSURANCE AGENCY, Plaintiff
 versus LOUIS CARNLEY, Defendant,

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

JOE SCHNEIDER d/b/a JOE SCHNEIDER BULDOZING AND DRAGLINE SERVICE.....

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 26
 day of May, 1949.

Reinhold
 Clerk of the Circuit Court.

NOTICE
TO DEFENDANT OF GARNISHMENT

BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

TO

JNO. S. HUFFMAN, Individually
a/d/b/a JNO. S. HUFFMAN
INSURANCE AGENCY

Plaintiff.....

VS.

LOUIS GARNLEY

Defendant.....

E. S. RICKARBY
P. O. BOX 71
FAIRHOPE, ALABAMA

Attorney for Plaintiff

State of Alabama
BALDWIN COUNTY

TO LOUIS CARNLEY, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of JNO
S. HUFFMAN, Individually a/d/b/a JNO S. HUFFMAN INSURANCE AGENCY Plaintiff,
versus LOUIS CARNLEY, Defendant,

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

JOE SCHNEIDER d/b/a JOE SCHNEIDER BULDOZING AND DRAGLINE SERVICE

has been named as Garnishee.

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

day of May, 1960

Eric J. Luck
Clerk of the Circuit Court.

4268

NOTICE

TO DEFENDANT OF GARNISHMENT

BY

CLERK OF CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

TO

JNO. S. HUFFMAN, Individually.

a/d/b/a JNO S. HUFFMAN

INSURANCE AGENCY

Plaintiff.....

VS.

LOUIS CARNLEY

Defendant.....

E. G. RICKARBY
P. O. BOX 71
FAIRHOPE, ALABAMA

Attorney for Plaintiff

Received 26 day of July 1960

and on 27 day of July 1960

I served a copy of the within

on Jane Carnley

By service on Jane Carnley

TAYLOR WILKINS, Sheriff
By W. O. Starnes D. S.

Settled between parties

SUMMONS AND COMPLAINT

Moore Ptg. 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 Louis Carnley

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-----

Louis Carnley-----, Defendant---

by Jno. Huffman, Individually and d/b/a Jno Huffman Insurance Agency-----
-----, Plaintiff---

Witness my hand this 26th day of May 19 60

Alfred Ruck, Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

JNO S. HUFFMAN, Individually
and doing business as JNO S.
HUFFMAN INSURANCE AGENCY

Plaintiff

VS

LOUIS CARNLEY

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him by account on to-wit the 30th day of November, 1959; which sum of money with interest thereon is still unpaid.

COUNT II

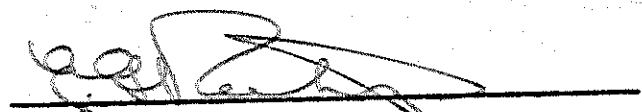
The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him by account for insurance sold by the Plaintiff to the Defendant on, to-wit; between the 18th day of August, 1958 and November 30th, 1959; which sum of money with the interest thereon is still unpaid.

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The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31) Dollars due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 30th day of November, 1959; which sum of money with interest thereon is still unpaid.


Attorney for the Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement of account, filed herewith.


Attorney for the Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, personally appeared JNO S. HUFFMAN, who, being duly sworn, deposes and says that he is Owner of the JNO S. HUFFMAN INSURANCE AGENCY, the owner of the attached account, and that the attached account is correct statement of account between LOUIS CARNLEY AND JNO S. HUFFMAN INSURANCE AGENCY, and that there is owing from the said LOUIS CARNLEY to the said, JNO S. HUFFMAN, Individually, and doing business as JNO S. HUFFMAN INSURANCE AGENCY, the sum of ONE HUNDRED NINETY FOUR and 31/100 Dollars (\$194.31), with interest from 30 Nov of Nov, 1960

Jno S. Huffman
AFFIANT

Subscribed and sworn to before me this the 28 day of May, 1960.

[Signature]
Notary Public, Baldwin County, Ala.

FIDELITY-PHENIX INSURANCE COMPANY

(FORMERLY THE METROPOLITAN CASUALTY INSURANCE COMPANY OF NEW YORK)

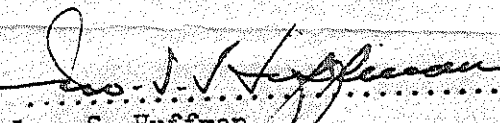
O. S. HUFFMAN INS. AGENCY
225 Fairhope Avenue
FAIRHOPE, ALA.
Telephone WA 8-2163

May 6, 1960

Louis Carnley Statement of Outstanding Accounts

| | Debit | Credit | Balance |
|---|--------|--------|---------|
| Audit on Last Year's W. C. and MFG.: | | | |
| C-262459 8-18-58 to 8-18-59 Catholic Church on Sec.St. | 98.18 | | 98.18 |
| MCS-80148 8-18-58 to 8-18-59 " " " " " | 14.73 | | 112.91 |
| This Year's Policies: | | | |
| C-307064 8-18-59 to 8-18-60 Req. for hospital job | 197.14 | | 310.05 |
| MCS-89382 8-18-59 to 8-18-60 " " " " | 55.24 | | 365.29 |
| Return Premium due to cancellation of above: | | | |
| C-307064 8-18-59 to 11-30-59 | | 106.44 | 258.85 |
| MCS-89392 8-18-59 to 11-30-59 | | 29.55 | 229.30 |
| Less Return Premium by cancellation of truck liability policy | | 34.99 | 194.31 |

The above bill is true and correct and has not been paid.


.....
Jno. S. Huffman

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

May 27, 1960

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

Dear Mrs. Duck:

Inre: Jno S. Huffman
Vs: Louis Carnley

Please dismiss the case of Huffman vs Carnley. Release
the Garnishee and take this check for \$36.00 and mark
costs paid.

Yours very truly,



EGR/wr
Enc:

cc: Joe Schneider
cc: Jno S. Huffman

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

P. O. BOX 71

May 25, 1960

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

Dear Mrs. Duck:

Inre: Jno S. Huffman Ins.
Vs: Louis Carnley

Please process immediately and rush down to the Sheriff's
office special.

Yours very truly,



EGR/wr

Enc:

cc: Jno S. Huffman

The State of Alabama,

BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas JNO S. HUFFMAN, Individually and d/b/a JNO S. HUFFMAN
INSURANCE AGENCY
 has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
 of said County, against LOUIS CARNLEY

for the sum of ONE HUNDRED NINETY FOUR and 31/100 Dollars and whereas, the said
JOE SCHNEIDER, d/b/a JOE SCHNEIDER BULDOZING AND DRAGLINE

SERVICE
 has entered into bond, and made affidavit as required by law that the said
LOUIS CARNLEY

is indebted to JNO S. HUFFMAN in the sum of ONE HUNDRED NINETY FOUR and 31/100 (\$194.31)
 Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such
 judgment as may be recovered by Plaintiff, and that JOE SCHNEIDER, d/b/a
JOE SCHNEIDER BULDOZING AND DRAGLINE SERVICE

is believed to be Chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Joe Schneider, d/b/a
Joe Schneider Buldozing and Dragline Service

to be and appear at the _____ term of the Circuit Court, to
 be holden for the County of Baldwin, on _____, 19____,
 then and there to answer, upon oath, whether, at the time of the service of this garnishment, or
 at the time of making your answer, or at any time intervening between the time of serving the
 garnishment and making the answer, you were indebted to the defendant, and whether, you
 will not be indebted to him in the future by a contract then existing, and whether by a contract
 then existing, you are liable to him 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 you have not in your possession or under your control money or
 effects belonging to the defendant.

Witness my hand this 26 day of May, 1960

Archie Duck

Clerk.

540

Clerk

Witness my hand this 10th day of May 1966

Witness my hand this 10th day of May 1966

where appearing to the defendant
because brother, and whether you have not in fact received or taken any money or
money which may be questioned by the delivery of personal property or which is payable in
any manner. You are liable to him for the delivery of personal property or for the payment of
any debt not be indebted to him in the future by a contract then existing and whether by a contract
contractment and whether the contract was made executed to the defendant and whether by a contract
at the time of receipt of the contract or at any time intervening between the time of receipt of the
then and there to receive from any person or persons at the time of the receipt of this contractment or
be subject for the contract of delivery on
to be and subject at the
term of the Circuit Court to

is prepared to be conducted in accordance with the rules

No. _____

**Circuit Court Of
Baldwin County**

JNO S. HUFFMAN, Individually,
a/d/b/a JNO S. HUFFMAN INSURANCE
AGENCY
vs. } Garnishment On Summons

LOUIS CARNLEY

Issued _____ day of _____, 19____

E. G. RECKARBY
P. O. BOX 71
Fairhope, Alabama
Attorney for Plaintiff

Plaintiff's Attorney.

Printed By The Baldwin Times

Received 26 day of May 1966
and on 26 day of May 1966
I served a copy of the within Sub
on Joe Schneider

By service on _____
TAYLOR WILKINS, Sheriff
By Ted Piser No. 3

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Ted Piser
DEPUTY SHERIFF

Circuit Court

Baldwin Times-100-0-11

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

June 9, 1960

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Huffman Insurance Agency
Vs: Louis Carnley
Case #4268
Our File: 5112

Please dismiss this case and recall process from the
sheriff.

Yours very truly,



EGR/ts

BOND

The State of Alabama, }

Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE,

Joe S. Huffman

are held and firmly bound unto

Louis Carnley

in the sum of

Three hundred eighty eight ⁶²/₁₀₀ \$388 ⁶²/₁₀₀ DOLLARS,

to be paid to the said

Louis Carnley

heirs, executors, administrators or assigns, for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators jointly, severally and firmly by these Presents.

Sealed with our seals, and dated this _____ day of _____, 19____

THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound

Joe S. Huffman

has commenced suit in the Circuit Court of said County by summons and complaint, which have issued from said Court, to recover of said

Louis Carnley

the sum of

One hundred ninety four ³¹/₁₀₀ (\$194 ³¹/₁₀₀) Dollars,

and has on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to

Joe S. Schneider individually and/or Joe Schneider

summoning him to answer what he is indebted to said Defendant, or what effects of said Defendant he has in his possession, or under his control; and

said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.

NOW, if the said Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as he may sustain, by reason of the wrongful or vexatious suing out of this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.

AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have now, or may hereafter have, under the Constitution and laws of Alabama, and do hereby severally certify that we have property free from all incumbrance, to the full amount of the above bond.

Joe S. Huffman (Seal)

Joe S. Huffman (Seal)

Barbara J. Thomas (Seal)

Approved this *26* day of

May A. D., 19*60*

Cliff. Duck Clerk.

The State of Alabama

Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared

who, being duly sworn, doth depose and say that

indebted to him in the sum of One hundred thirty four ⁵¹/₁₀₀ Dollars, 1943
and that he has commenced on suit by summons and complaint on said indebtedness
against the said Louis Carnley

and that for H. Schneider & Co. for Schneider
Refrigerating Co.

supposed to be indebted to the said Defendant, or to have effects of the said Defendant, in his
possession, or under his control, and that he believe that process of Garnishment against the said
for H. Schneider - Louis Carnley.
is necessary to obtain satisfaction of said claim; and that the said for H. Schneider
is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose
of vexing or harassing said Defendant, or other improper motives.

Sworn to and subscribed before me this 25 day of May 1960

Alice J. Duck, Clerk Circuit Court.

116

No. 42-68

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT

for H. Schneider & Co.
d/b/a for H. Schneider
Plaintiff

TO

Louis Carnley
Defendant

Bond and Affidavit in Garnishment
on Summons

FILED

Filed this day of

MAY 26 1960

ALICE J. DUCK
CLERK
REGISTER

Printed by Moore Ptg. Co.

for H. Schneider & Co.
Attorney