

JEFFERSON STANDARD LIFE INSURANCE COMPANY

GREENSBORO, NORTH CAROLINA

DONALD Q. TAYLOR
ASSOCIATE GENERAL COUNSEL

4641
May 3, 1961

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

Re: Bruce C. Hastings vs. Willard F. Hudson,
Circuit Court of Baldwin County, Alabama

Dear Ms. Duck:

I am enclosing herewith an answer of Jefferson Standard Life Insurance Company as garnishee in connection with the above matter. I will appreciate your filing this in the record of this case.

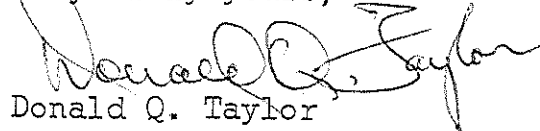
I am enclosing an additional copy of the answer which I wish you would be kind enough to furnish to the attorney who obtained the writ of garnishment. The writ itself did not show his name or address, hence we could not extend him the courtesy of furnishing him a copy.

You will note from the answer that we have been unable to find any record of any connection between Jefferson Standard Life Insurance Company and the defendant, Willard F. Hudson.

I am also enclosing a copy of this letter which you may wish to furnish the attorney obtaining this writ.

Thanking you for your attention to this matter, I remain

Very truly yours,


Donald Q. Taylor

Enc. 3
DQT/aw

JEFFERSON STANDARD LIFE INSURANCE COMPANY

GREENSBORO, NORTH CAROLINA

DONALD Q. TAYLOR
ASSOCIATE GENERAL COUNSEL

4644
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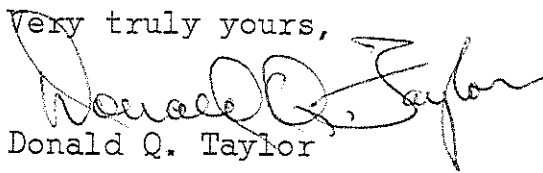
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DQT/aw

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

June 2, 1961

WHITEHALL 3-3601

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Bruce C. Hastings
Vs: Willard F. Hudson
At Law, No. 4641

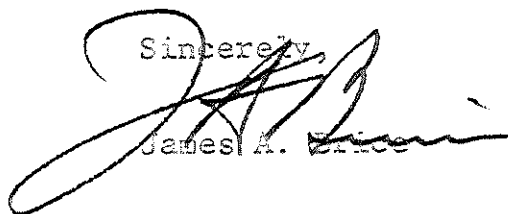
Dear Mrs. Duck:

Please place the above file before Judge Hall, with request that he enter judgment by default for the plaintiff, for \$3,000.00 principal and \$720.00 interest, a total of \$3,720.00.

Enclosed herewith is the promissory note which is the foundation of the suit.

Thank you.

Sincerely,



James A. Brice

cc: Mr. Bruce Hastings

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

May 12, 1961

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Bruce C. Hastings
Vs: Willard F. Hudson and
Jefferson Standard Life Ins. Co.,
Garnishee, At Law, No. 4641

Dear Mrs. Duck:

Kindly dismiss the above action insofar as garnishment
is concerned, and send me a cost bill for that part.

Thank you.

Sincerely,


James A. Brice

JAB:j

cc: Donald Q. Taylor, Esquire
Jefferson Standard Life Ins. Co.
Greensboro, North Carolina

Mr. W. G. Sanders, Agent
Fidelity & Casualty Company of New York
Foley, Alabama

IN THE CIRCUIT COURT OF BALDWIN COUNTY
STATE OF ALABAMA

Bruce C. Hastings,)	
)	
Plaintiff)	ANSWER OF GARNISHEE,
vs.)	
)	JEFFERSON STANDARD LIFE INSURANCE
Willard F. Hudson,)	COMPANY
)	
Defendant)	

Jefferson Standard Life Insurance Company, answering the writ of garnishment (copy of which is attached hereto) served upon it on April 28, 1961 in the above-captioned matter, alleges and says that:

1. Jefferson Standard Life Insurance Company has made a careful search of its records and can find no record of any connection between it and the above-named defendant, Willard F. Hudson, as an agent, employee, policyholder, stockholder, borrower or creditor, or any other contractual relationship with said defendant.
2. Jefferson Standard Life Insurance Company, as set out above, has no record of any indebtedness to the defendant, Willard F. Hudson, either at the time of service of the within writ of garnishment or as of this day.
3. Jefferson Standard Life Insurance Company does not have any record of any contractual relationship with the above-named defendant which would cause it to be indebted to said defendant in the future.
4. Jefferson Standard Life Insurance Company has no record of any contract or other agreement for the delivery of personal property to the above-named defendant.
5. Jefferson Standard Life Insurance Company has no record of any money or other effects in its possession belonging to the defendant, Willard F. Hudson.

This the 3rd day of May, 1961.

JEFFERSON STANDARD LIFE INSURANCE COMPANY
By V. A. Sapp Vice President

I, A. C. Whiteley, a Notary Public in and for the County of Guilford, State of North Carolina, certify that V. A. SAPP, who is personally known to me and who is known to me to be a Vice President of JEFFERSON STANDARD LIFE INSURANCE COMPANY, after first being duly sworn, executed and acknowledged the foregoing statement and answer in his capacity as Vice President of Jefferson Standard Life Insurance Company, and by and for said Company.

Witness my hand and notarial seal, this 3rd day of May, 1961.

A. C. Whiteley
Notary Public

My commission expires November 16, 1961

FILED

MAY 5 1961

ALICE J. DUCK, CLERK, REGISTER

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, Bruce C. Hastingshas commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
of said County, against Willard F. Hudsonfor the sum of Three thousand and no/100 Dollars and whereas, the said
Bruce C. Hastings

has entered into bond, and made affidavit by law that the said

Willard F. Hudsonis indebted to Bruce C. Hastings in the sum of Three thousandDollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such
judgment as may be recovered by Plaintiff, and thatJefferson Standard Life Insurance Company

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said

Jefferson Standard Life Insurance Companyto be and appear at the next term of the Circuit Court, to

be holden for the County of Baldwin, on (Within 30 days), 1916
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 gar-
nishment 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
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 pro-
perty, and whether you have not in your possession or under your control money or effects be-
longing to the defendant.

Witness my hand this 16th day of March

1916

Alice J. Puck
Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas, Bruce C Hastings

has commenced suit by Summons and Complaint returnable to the next term of the Circuit Court
of said County, against Willard F. Hudson

for the sum of Three thousand and no/100 Dollars and whereas, the said
Bruce C. Hastings

has entered into bond, and made affidavit by law that the said

Willard F. Hudson

is indebted to Bruce C. Hastings in the sum of Three thousand

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

Jefferson Standard Life Insurance Company

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said Willard F. Hudson

Jefferson Standard Life Insurance Company

to be and appear at the next term of the Circuit Court, to

be holden for the County of Baldwin, on (Within 30 days), 1961
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 gar-
nishment 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 pro-
perty, and whether you have not in your possession or under your control money or effects be-
longing to the defendant.

Witness my hand this 16th day of March, 1961

W. J. Duck
Clerk.

EXECUTED this the 19 day of March 1961
by leaving a copy of the within with
HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama D.S.
By TRAVELING EXPENSE \$1.00 D.S.

*Returned for
Correction in ~~summons~~*

MAR 21 1961
HOLT A. McDOWELL

*J. Lloyd
Deputy Sheriff
Jeff Co. Ala.*

No. 4641
Circuit Court of Baldwin County

BRUCE C. HASTINGS

VS.

Garnishment On Summons

WILLARD F. HUDSON

Jefferson Standard Life Insurance,
Garnishee

*Bham Ala
Brown Mary Bldg*
Issued 16th day of March, 19 61

void

1227

*48 ave N,
St Petersburg, Fla*

817

Plaintiff's Attorney

L B. Mary

28 April 61
executed this the 28 day of April 1961
in Jeff Standard Life
Ins Co.

by leaving a copy of within with

Clyde E. Carlier
of said co *at yx.*
HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama
by *J. Lloyd* D.S.

1 Mule

State of Alabama

BALDWIN COUNTY

TO Willard F. Hudson

Defendant

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

BRUCE C. HASTINGS

Plaintiff

versus WILLARD F. HUDSON

Defendant

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

Jefferson Standard Life Insurance Company

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 16th

day of March, 1941

Clerk of the Circuit Court.

Returned 20th day of March 1961
Not found in my county after diligent search and inquiry.

By Taylor Wilkins, Sheriff
Taylor Wilkins
Deputy Sheriff

No. 4641

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

TO

~~WILLARD F. HUDSON~~

BRUCE C. HASTINGS

Plaintiff.....

VS.

WILLARD F. HUDSON

Defendant.....

copy Mailed
cert mail to
H-26-61

BOND

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Know All Men by These Presents, That we, Bruce C. Hastings as principal and Fidelity & Casualty Company of New York as surety are held and firmly bound unto Willard F. Hudson in the sum of Six Thousand and No/100 (\$6,000.00) Dollars to be paid to the said Willard F. Hudson, 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 25th day of June A. D., one thousand nine hundred and sixty.

The condition of the above obligation is such, that, whereas, the above bound Bruce C. Hastings has commenced suit in the Circuit Court of Baldwin County, by summons and complaint returnable to the next term of said Court, to recover of said Willard F. Hudson the sum of Three Thousand and No/100 (\$3,000.00) Dollars and has, on the day of the date hereof, prayed that writ of garnishment issue to Jefferson Standard Life Insurance Company, a corporation, to answer on oath whether at the time of the service of the said writ of garnishment or at the time of making its answer it has in its possession, or under its control any money or effects belonging to the defendant Willard F. Hudson and whether it is indebted to said defendant, or is liable to Willard F. Hudson on any contract for the payment of money or 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, and said plaintiff having made affidavit as required by law in such cases and by entering into this bond, has obtained the same, returnable to the Spring term of the Circuit Court of Baldwin County.

Now, if the said plaintiff shall prosecute the garnishment to effect, and pay the defendant all such costs and damages as Willard F. Hudson 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.



Bruce C. Hastings
Bruce C. Hastings

Fidelity & Casualty Company
of New York,

By William G. Sacher
As its Attorney in Fact

Approved this 16 day of March 1960.

Dee J. Sacher
Clerk

MS.
4641

AFFIDAVIT FOR GARNISHMENT
IN AID OF PENDING SUIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, James A. Brice, who being sworn, deposes and says that he is attorney for Bruce C. Hastings; that Willard F. Hudson is indebted to the said Bruce C. Hastings in the sum of \$3,000.00, and that the said Bruce C. Hastings has commenced suit by Summons and Complaint returnable to the Spring Term of this Court against Willard F. Hudson, and he believes the process of garnishment against Jefferson Standard Life Insurance Company is necessary to obtain satisfaction of said claim, and that said Jefferson Standard Life Insurance Company has or is believed to have in its possession or under its control, money belonging to the defendant, or that Jefferson Standard Life Insurance Company is, or is believed to be indebted to the defendant.


James A. Brice

Sworn to and subscribed before me
this 16 day of March 19 61.


Clerk of the Circuit Court

FILED

MAR 16 1961

ALICE J. DUCK, CLERK
REGISTER

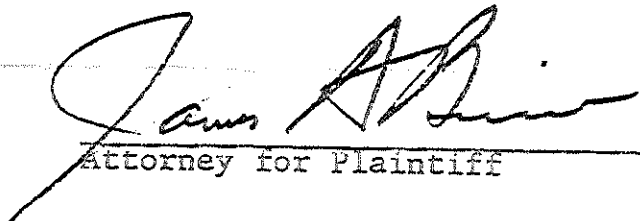
AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

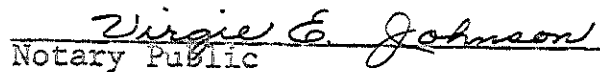
Before me, the undersigned Notary Public in and for State of Alabama at large, personally appeared James A. Brice, who after being duly sworn, deposes and says:

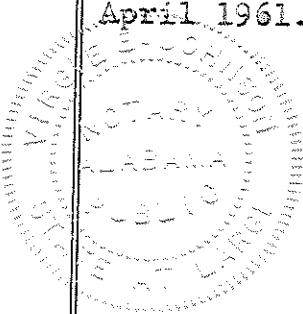
That he is the attorney for the Plaintiff and that certain action pending in Circuit Court of Baldwin County, Alabama, styled as Bruce C. Hastings vs Willard F. Hudson, At Law No. 4641; that the defendant in said cause is not now a resident of Baldwin County, Alabama; that the said Willard F. Hudson, defendant, is believed to be residing at 1227 Forty-eighth Avenue North, St. Petersburg, Florida; that he believes the said defendant, Willard F. Hudson, to be over the age of 21 years.

Done this 25th day of April 1961.


Attorney for Plaintiff

Sworn to and subscribed before me this 25th day of April 1961.


Notary Public



FILED

APR 26 1961

MADE I DUCK, CLERK
REGISTER

BRUCE C. HASTINGS,
PLAINTIFF
VS
WILLARD F. HUDSON,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

4641

I

The plaintiff claims of the defendant the sum of Three Thousand and NO/100 (\$3,000.00) Dollars, due by promissory note made by the defendant on the 16th day of May, 1957, and payable on the 16th day of July, 1957, which sum is still unpaid.


Attorney for Plaintiff

FILED

MAR 16 1961

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Willard F. Hudson

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 _____

Willard F. Hudson

Defendant

by _____

Bruce C. Hastings

Plaintiff

Witness my hand this

16

day of

March 1961

Bruce C. Hastings

Clerk

No. 4641

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Bruce C. Hastings

Plaintiffs

vs.

Willard F. Hudson

Defendants

Summons and Complaint

FILED

Filed _____ 19____

MAR 10 1961

ALICE J. DUCK, CLERK
REGISTER

Clerk

*copy mailed by
cert mail 4-26-61*

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

*1227 4th Ave. N.
St. Petersburg, Fla*

Defendant lives at _____

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with _____

returned 20th day of March 1961
Not found in my county after diligent search and in-
quiry.
By Taylor Wilkins Sheriff
Taylor Wilkins Deputy Sheriff

Sheriff.

Deputy Sheriff.

AFFIDAVIT FOR GARNISHMENT
IN AID OF PENDING SUIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

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plaint returnable to the Spring Term of this Court against
Willard F. Hudson, and he believes the process of garnish-
ment against Jefferson Standard Life Insurance Company is
necessary to obtain satisfaction of said claim, and that said
Jefferson Standard Life Insurance Company has or is believed to
have in its possession or under its control, money belonging
to the defendant, or that Jefferson Standard Life Insurance
Company is, or is believed to be indebted to the defendant.


James A. Brice

Sworn to and subscribed before me
this _____ day of March 19____.

Clerk of the Circuit Court

\$11,000.⁰⁰

Havran & Co La May 16th 1957

Sixty days after date of promise to pay to
the order of Bruce C. Hastings, Hinsdale, Ill.

Eleven Thousand and 75/100 ————— Dollars
at 404 No. Adams, Hinsdale, Ill.

Value received

No. Due July 16th 1957 William F. Hudson