

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ben F. Harper 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 same, then and there to answer the complaint of George Collom, individually and doing business as Wagon Jobbers Wholesale Distributors.

Witness my hand this 27 day of March, 1962.

Alice J. Duck
Clerk

Ed-4-6-62

GEORGE COLLOM, Individually X
and doing business as Wagon X
Jobbers Wholesale Distributors, X

Plaintiff, X

vs. X

BEN F. HARPER, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5099

COUNT ONE:

The Plaintiff claims of the Defendant One Thousand Six Hundred Eighty-three Dollars Nineteen Cents (\$1,683.19) due from him by account on the 24th day of September, 1961, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant One Thousand Six Hundred Eighty-three Dollars Nineteen Cents (\$1,683.19) for merchandise, goods and chattles sold by the Plaintiff to the Defendant from, to-wit: the 12th day of August, 1961, until the 24th day of September, 1961, which sum of money with the interest thereon, is still unpaid.

FILED

MAR 27 1962

E. J. DUCK, CLERK
REGISTER

205

John Earle Chason
Attorney for Plaintiff

Attached hereto and made a part
hereof is an itemized and veri-
fied statement of the account
herein sued upon.

John Earle Chason
Attorney for Plaintiff

Ben F. Harper:
Corner of White and Targe
Streets in Fairhope

FILED
MAR 27 1962
ALICE L. DUCK, CLERK
REGISTER

STATE OF ALABAMA

MOBILE COUNTY

Before me, J. W. Petty, a Notary Public, in and for said County and State, personally appeared George Collom, who, being by me duly sworn, deposes and says; that he is the sole owner of, and does business as Wagon Jobbers Wholesale Distributors, and as such has personal knowledge of the books and records of Wagon Jobbers Wholesale Distributors; that the annexed statement of the account of Wagon Jobbers Wholesale Distributors against Ben F. Harper, of Fairhope, in the State of Alabama, is just, true and correct; and that there is now due on said account to the said George Collom, doing business as Wagon Jobbers Wholesale Distributors, the sum of \$1683¹⁹ after deducting and allowing all credits, setoffs or counter claims.

George Collom

Sworn to and subscribed before
me on this the 23rd day of
March 1962.

J. W. Petty
Notary Public, Mobile County, Alabama

WAGON JOBBERS WAREHOUSE DISTRIBUTOR

A Geo. Collom Enterprise

1569 DAUPHIN STREET

MOBILE, ALABAMA

Ben F. Harper Statement

8-12-61	#045732	\$458.09
8-18-61	#014153	486.35
9-2-61	none	89.41
9-24-61	022263	349.92
9-24-61	022262	354.76
		<hr/>
		\$1729.53
9-23-61	Credit #022261	46.34
		<hr/>
		\$1683.19

Received 27 day of March 1912
and on 6 day of April 1912
I served a copy of the within B & C
on Ben F. Harper

By service on Ben F. Harper

TAYLOR WILKINS, Sheriff

By W. C. Garner D. E.

Shope

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

GEORGE COLLOM, Individually and
doing business as Wagon Jobbers
Wholesale Distributors,

Plaintiff,

vs.

BEN F. HARPER,

white + George St Shope
Defendant

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

* * * * *

FILED

MAR 27 1912

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW

BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO: ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WHEREAS, John Earle Chason has made affidavit as required by law that George Collom, individually, and doing business as Wagon Jobbers Wholesale Distributors, on the 11th day of June, 1962, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Ben F. Harper for the sum of Six Hundred Fifty-eight and 92/100 Dollars (\$658.92), and the further sum of Twenty-three and 50/100 Dollars (\$23.50) cost of said suit; that only Fifty Dollars (\$50.00) has been paid toward the satisfaction of said judgment and costs; that he believes that process of garnishment is necessary to obtain satisfaction of said judgment and that F. C. Griffin, individually, and doing business as Griffin Motor Supply, of Loxley, Alabama, has, or is believed to have, in his possession or under his control, money or effects belonging to the Defendant, or that he is, or is believed to be, indebted to the Defendant or to be liable to the Defendant 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.

These are, therefore, to command you that you summon the said F. C. Griffin, individually, and doing business as Griffin Motor Supply, of Loxley, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty days after the service of this Writ of Garnishment, then and there to answer on oath, whether, at the time of the service of this Writ, or at the time of making his answer, he has in his possession or under his control, any money or effects belonging to the Defendant; and whether he is indebted to said Defendant, or is liable to him 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.

WITNESS my hand and seal as Clerk of the Circuit Court of
Baldwin County, Alabama, on this the 25th day of October, 1962.

Alvin J. Huch
Clerk

Received 25 day of Oct 1962
and on 7th day of Nov 1962
I served a copy of the within Return
on J. C. Griffin

By service on _____

TAYLOR WILKINS, Sheriff

By Fred Herbert D. S.
Lophy

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Fred Herbert
DEPUTY SHERIFF

5099 1/2

George Collom

vs

Ben Harper

- - - -

F.C. Griffin
Barnishee

To be served out
F.C. Griffin - Loxley

GEORGE COLLOM, Individually,
and doing business as WAGON
JOBBER'S WHOLESALE DISTRIBUTORS,

Plaintiff,

vs.

BEN F. HARPER,

Defendant,

F. C. GRIFFIN, Individually,
and doing business as GRIFFIN
MOTOR SUPPLY,

Garnishee.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5099 1/2

TO: ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to notify Ben F. Harper that on the 25th day of October, 1962, a Writ of Garnishment in the above styled cause was issued to F. C. Griffin, Individually, and doing business as Griffin Motor Supply, of Loxley, Alabama, as Garnishee.

And you will return this Writ according to law.

WITNESS my hand on this the 25 day of October, 1962.

David J. Duck
Clerk

Received 25 day of Oct 1962
and on 7¹⁴ day of Nov 1962
I served copy of the within Notice
on Ben F. Harper
By service on _____

TAYLOR WILKINS, Sheriff

By Fred Leibel D. S.

Lofby
40

Sheriff claims _____ miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Seibert
DEPUTY SHERIFF

5049 1/2

George Collom

VS.

Ben F. Harper

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Alice J. Duck, Clerk of the Circuit Court, in and for said County and State, personally appeared John Earle Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That George Collom, individually, and doing business as Wagon Jobbers Wholesale Distributors, on the 11th day of June, 1962, in the Circuit Court of Baldwin County, Alabama, recovered a judgment against Ben F. Harper for the sum of Six Hundred Fifty-eight and 92/100 Dollars (\$658.92), and the further sum of Twenty-three and 50/100 Dollars (\$23.50) cost of said suit, and that only Fifty Dollars (\$50.00) has been paid on said judgment at this time and that he believes that process of garnishment is necessary to obtain satisfaction of said judgment, and that F. C. Griffin, individually and doing business as Griffin Motor Supply, of Loxley, Alabama, has, or is believed to have, in his possession or under his control, money or effects belonging to the Defendant, or that he is, or is believed to be, indebted to the Defendant, or to be liable to the Defendant 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.

John Earle Chason

Sworn to and subscribed before me on
this the 25th day of October, 1962.

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