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RALPH D. ABERNATHY, et al.,)
Plaintiffs, : Civil Action,
VS.) File No. _____
JOHN PATTERSON, et al., :
Defendants.)

AFFIDAVIT

STATE OF ALABAMA }
COUNTY OF MONTGOMERY } ss.:

RALPH D. ABERNATHY, being duly sworn deposes and says:

1. He is one of the plaintiffs in the above entitled action.

2. That this action is brought to enjoin the defendants, their agents, servants, employees, attorneys and other divers persons from acting under their authority from the further levies, executions and garnishments; and to enjoin further proceedings brought against the New York Times, Company, a Corporation, et al. by the defendants which are presently pending in the Circuit Court of Montgomery County, Alabama, which were instituted by the defendants John Patterson and Frank Parks, as well as other relief as set forth in the complaint.

3. Deponent is presently threatened with immediate, imminent and irreparable injury and harm in that his automobile in which he owns a one half equity is scheduled to be sold Tuesday, February 21st, 1961 pursuant to an execution to be conducted in Montgomery County. In addition, the sale of other real property of which deponent and other plaintiffs in the above entitled action of which plaintiffs have an interest is similarly threatened with immediate, imminent and irreparable injury.

RALPH D. ABERNATHY

Sworn to and subscribed before
me this day of
1961

NOTARY PUBLIC

DISTRICT COURT OF THE UNITED STATES FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RALPH D. ARBUTHNOT, et al.,
Plaintiffs,
vs.
JOHN PATTERSON, et al.,
Defendants.

Civil Action,
File No. _____

AFFIDAVIT

STATE OF ALABAMA
COUNTY OF MONTGOMERY

RALPH D. ARBUTHNOT, being duly sworn deposes and says:

1. He is one of the plaintiffs in the above entitled

2. That this action is brought to enjoin the defendants, their agents, servants, employees, attorneys and other persons from acting under their authority from the further seizure, execution and garnishments, and to enjoin further proceedings brought against the New York Times Company, a corporation, et al. by the defendants who are presently pending in the Circuit Court of Montgomery County, Alabama, which were instituted by the defendants John Patterson and Frank Barker, as well as other relief as set forth in the complaint.

3. Dependent is presently threatened with immediate, imminent and irreparable injury and harm in that his automobile in which he owns a one half equity is scheduled to be sold Tuesday, February 21st, 1931 pursuant to an execution to be conducted in Montgomery County. In addition, the sale of other real property of which dependent and other plaintiffs in the above entitled action of which plaintiffs have an interest is similarly threatened with immediate, imminent and irreparable injury.

RALPH D. ARBUTHNOT

Sworn to and subscribed before
me this _____ day of _____
1931

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