VALDEMAR R. KREHER,	X	IN THE CIRCUIT COURT OF
Plaintiff,	·· X	BALDWIN COUNTY, ALABAMA
-vs-	X	AT LAW
NATHAN B. McQUIRTER,	X	CASE NO. 4981.
Defendant.	X	OASE 110. 4901.

Comes now the Plaintiff in the above mentioned cause and amends the complaint heretofore filed in said cause by increasing the amount of damages heretofore filed from Nine Hundred and Fifty (\$950.00) Dollars to One Thousand Seven Hundred and fifty (\$1,750.00) Dollars and in all other respects the complaint is to remain the same.

LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Route One, Box 18 Daphne, Alabama

FILED

MAR S 1962

ALICE J. DUCK, CLERK REGISTER

VALDEMAR R. KREHER,	ž	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	X.	AT LAW
NATHAN B. McQUIRTER,	X	case no. <u>4981</u>
Defendant.	X	-

COUNT ONE

Plaintiff claims of the Defendant the sum of Nine Hundred
Fifty (\$950.00) Dollars, damages, for that heretofore and on to-wit,
March 18th, 1961, the Defendant so negligently operated a motor vehicle
on United States Highway 90, at a point, to-wit, three miles east
of the Bay Branch Bridge, Baldwin County, Alabama, said highway being
a public highway in and for said State and County, as to cause or
allow said motor vehicle to run into, upon, or against, the plaintiff's
automobile, which was on said public highway at said time and place
and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's automobile was badly bent, broken and damaged
and he lost the use thereof for a long period of time, hence this
suit.

LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Route 1, Box 78 Daphne, Alabama



THE STATE OF ALABAMA,

BALDWIN COUNTY

vo.	4981	COULT,	DAGOWIN	COUN	1.4. 3
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CIRCUIT COURT, BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Sun	Nathan B. McQuirter	
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	nur, within thirty days from the service hereof, t	
Nathan B. McQuirte	State of Alabama, at Bay Minette, against	
h	Valdemar R. Kreher	, Defendant
		73 4:40
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EN-1-4-62	- Ulice J. H	McC, Clerk

	4981		•	
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			Defendants	
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			Plaintiff's Attorne	Jaylos Wilkinsheriff
:1		D	efendant's Attorney	W.O. Jaines Députy Sheriff
)				Daphne

₹,

VALDEMAR R. KR	EHER,	X	IN THE CIRCUIT COURT OF
	Plaintiff,	X	BALDWIN COUNTY, ALABAMA
-vs-		X.	AT LAW
NATHAN B. McQU	IRTER,	X	CASE NO. 4981.
	Defendant.	X	CASE NO. 4901.

Comes now the Plaintiff in the above styled cause and shows unto this Court that a summons was heretofore issued out of this Court in the above styled cause, directed to Nathan B. McQuirter, Defendant herein, ordering Nathan B. McQuirter to appear and plead, answer or demur, within thirty (30) days from the service thereof to the complaint in this cause, and that a copy of said summons was personally served upon the said Nathan B. McQuirter by the proper officer on to-wit January 4th, 1962, and that the Defendant has to the day hereof failed to plead, answer or demur to said complaint; WHEREFORE, Plaintiff moves that a judgment by default be entered against the defendant, with leave to prove damages.

This the 6th day of February, 1962.

FEB 7 1962

LYONS, PIFES AND COOK Attorneys for the Plaintiff

VALDEMAR R. KREHER,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
-VS-)	AT LAW
NATHAN B. McQUIRTER,)	CASE NO. 4981
Defendant.)	

Comes now the Plaintiff in the above styled cause and shows unto this Court that an amended summons and complaint was heretofore issued out of this Court in the above styled cause, directed to Nathan B. McQuirter, Defendant herein, ordering Nathan B. McQuirter to appear and plead, answer or demur, within thirty (30) days from the service thereof to the amended complaint in this cause, and that a copy of said summons was personally served upon the said Nathan B. McQuirter by the proper officer on to-wit, March 30, 1962, and that the Defendant, Nathan B. McQuirter, has to the day hereof failed to plead, answer or demur to said complaint; wherefore, Plaintiff moves that a judgment by default be entered against the Defendant, with leave to prove damages.

This the 2 day of May, 1962.

LYONS, PIPEZ & COOK
Attorneys for the Plaintiff

MAY 2 1962 AUCE I DUX, CLERK REGISTER

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, IH
WALTER M. COOK
FRANK T. POPE JR
CORDON B. KAHN
IRWIN W. COLEMAN, JR.

February 6, 1962

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

Re: Valdemar R. Kreher v. Nathan B. McQuirter Circuit Court of Baldwin County, Alabama At Law, Case No. 4981.

Dear Mrs. Duck:

Some time ago, we received notice from you that personal service was had on the defendant in the above mentioned matter on January 4th, 1962. Thirty days have passed and we have not received word that any answer or appearance has been filed in behalf of the defendant. If this is so, we would appreciate filing this motion for a judgment by default with leave to prove damages.

Very truly yours,

LYONS, PIPES AND COOK

GOLGON D. Kann

GBK:mb

LYONS, PIPES AND COOK ATTORNEYS-AT-LAW

516-519 FIRST NATIONAL BANK BUILDING
HE 2-4484 P. O. BOX 265
MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN

IRWIN W. COLEMAN, JR.

February 6, 1962

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

Re: Valdemar R. Kreher v. Nathan B. McQuirter Circuit Court of Baldwin County, Alabama At Law, Case No. 4981.

Dear Mrs. Duck:

Some time ago, we received notice from you that personal service was had on the defendant in the above mentioned matter on January 4th, 1962. Thirty days have passed and we have not received word that any answer or appearance has been filed in behalf of the defendant. If this is so, we would appreciate filing this motion for a judgment by default with leave to prove damages.

Very truly yours,

LYONS, PIPES AND COOK

Gordon B. Kahn

GBK: mb

The State of Alabama,	CIRCUIT COU	'RT	Term, 19
Baldwin County			·
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VALDEMAR R. KREHER			
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	Plaintiff		and the second
	Vs.	u .,	
NATHAN B. McQUIRTER			
			
		· vpr na	
	Defendant		
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Alabama, do hereby certify that on the	8th day of	February	19 62
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a judgment was rendered by said Court in t	he above stated caus	e, wherein	
		,	
Valdemar R. Kr	eher		
was Plaintiff and Nathan B. McQu	irter		
			was Defendant, in
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in said cause.			
Witness my hand thisda	y of	, 19_	er en en
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Clerk, Circuit Court, Baldwin County, Alabama

VALDEMAR R. KREHER,	X	IN THE CIRCUIT COURT OF
Plaintiff,	I	BALDWIN COUNTY, ALABAMA
-vs-	X	AT LAW
NATHAN B. McQUIRTER,	X	CASE NO. 4981.
Defendant.	. A	whom hos wyone

Comes now the Plaintiff in the above styled cause and shows unto this Court that a summons was heretofore issued out of this Court in the above styled cause, directed to Nathan B. McQuirter, Defendant herein, ordering Nathan B. McQuirter to appear and plead, answer or demur, within thirty (30) days from the service thereof to the complaint in this cause, and that a copy of said summons was personally served upon the said Nathan B. McQuirter by the proper officer on to-wit January 4th, 1962, and that the Defendant has to the day hereof failed to plead, answer or demur to said complaint; WHEREFORE, Plaintiff moves that a judgment by default be entered against the defendant, with leave to prove damages.

This the 6th day of February, 1962.

LATONS, PAPES AND COOK Attorneys for the Plaintiff VALDEMAR R. KREHER,

Plaintiff,

BALDWIN COUNTY, ALABAMA

AT LAW

NATHAN B. McQUIRTER,

Defendant.

I CASE NO. 497/

COUNT ONE

Plaintiff claims of the Defendant the sum of Nine Hundred

Fifty (\$950.00) Dollars, damages, for that heretofore and on to-wit,

March 18th, 1961, the Defendant so negligently operated a motor vehicle
on United States Highway 90, at a point, to-wit, three miles east

of the Bay Branch Bridge, Beldwin County, Alabama, said highway being
a public highway in and for said State and County, as to cause or
sllow said motor vehicle to run into, upon, or against, the plaintiff's
automobile, which was on said public highway at said time and place
and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's automobile was badly bent, broken and damaged
and he lost the use thereof for a long period of time, hence this
suit.

LYDNS, PIVES AND COOK
Actorneys for the Plaintiff

Defendant may be served at:

Route 1, Box 78 Daphne, Alabama



Grand Carlotte School Carlotte, 1895. 1881 See Creek Mary, Ch. 2-1663 FREMARIO, MAA.

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ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
FRANK Y. POPE, JR.
GORDON S. KAHN
IRWIN W. COLEMAN JR.

March 8, 1962

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

Re:

Valdemar R. Kreher v. Nathan B. McQuirter In the Circuit Court of Baldwin County, Alabama Case No. 4981.

Dear Mrs. Duck:

We enclose herewith an amendment to the original complaint in the above mentioned cause. This is the case on which we spoke to you and Judge Hall on March 8th, 1962. The Judge informed us that he would set aside the judgment by default so that we might enlarge the amount of damages requested.

Very truly yours,

LYONS, PIPES AND COOK

Gordon B. Kahn

GBK:mb

Encl.

VALDEMAR R. KREHER,)	IN THE CIRCUIT COURT OF
Plaintiff.)	BALDWIN COUNTY, ALABAMA
≈ \$5 ~)	AT LAW
NATHAN B. McQUIRTER,)	CASE NO. 4981
Defendant.	>	

Comes now the Plaintiff in the above styled cause and shows unto this Court that an amended summons and complaint was heretofore issued out of this Court in the above styled cause, directed to Nathan B. McQuirter, Defendant herein, ordering Nathan B. McQuirter to appear and plead, answer or demur, within thirty (30) days from the service thereof to the amended complaint in this cause, and that a copy of said summons was personally served upon the said Nathan B. McQuirter by the proper officer on to-wit, March 30, 1962, and that the Defendant, Nathan B. McQuirter, has to the day hereof failed to plead, answer or demur to said complaint; wherefore, Plaintiff moves that a judgment by default be entered against the Defendant, with leave to prove damages.

This the 2 day of May, 1962.

LYONS/PIPES & COOK

Attorneys for the Plaintiff

VALDEMAR R. KREHER,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

-vs-

AT LAW

NATHAN B. McQUIRTER,

Defendant. CASE NO. 4981

• • •

COMES NOW the plaintiff in the above-styled cause and shows that heretofore a notice was issued out of this Honorable Court by the Clerk thereof requiring the abovenamed defendant to file a statement of his assets as required by the Code of Alabama of 1940, as amended, Title 7 Section 903; that said notice was duly and personally served on the said defendant on to-wit the 28th day of September, 1963; that said defendant has willfully refused to file such statement although more than thirty (30) days from the service of such notice has passed.

WHEREFORE, the premises considered, the plaintiff petitions the Court that the said Nathan B. McQuirter be cited for contempt of Court and that he be required to appear before the court at a time and place to be fixed, to show cause, if any he have, why he should not be held in contempt of Court for willfully refusing to file such statement of assets. And your petitioner prays for such other and further relief as is proper in the premises.

> LYONS, PIPES & COOK Attorneys for the Plaintiff

Gordon B.

Defendant may be served at Route 1, Box 78-E, Daphne, Alabama.

VALDEMAR R. KREHER

IN THE CIRCUIT COURT OF

Complainant,

vs:

BALDWIN COUNTY, ALABAMA

AT LAW

XINVEQUITY CASE NO. 4981

NATHAN B. McOUIRTER

Respondent

RULE TO SHOW CAUSE

This day came <u>Hon. Gordon B. Kahn</u> and filedhis verified petition praying that <u>Nathan B. McQuirter</u> be required to appear and show cause, if any he may have, why he should not be punished as for a contempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is

Let a copy of said petition and of this rule to show cause be served forthwith, personally, upon the said Nathan B. McQuirter by the Sheriff of Baldwin County, Alabama.

Done this 6th day of April , 1964.

Judge, Circuit Court of Baldwin County, Alabama

	The State of Alabama, Baldwin County. TO ANY SHERIFF OF THE S	Circuit Court, Baldwin County No. 4981 TERM.	19
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en e		10 A.M. 22 day of April. 1964	
		, State of Alabama, at Bay Minette, against	
		Nathan B. McQuirter	adant
	by	Valdemar R. Kreher	
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The State of Alabama,	No.4981	· · · · · · · · · · · · · · · · · · ·
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Plaintiff's Attorney	
Defendant's Attorney	Sheriff.
Defendant 8 Intollies	Deputy Sheriff.

IN THE CIRCUIT COURT OF VALDEMAR R Complainant, BALDWIN COUNTY, ALABAMA vs: AT LAW XENXEQUEEX CASE NO. 4981 Respondent. RULE TO SHOW CAUSE This day came Hon, Gordon R. Kelm and filed terified petition praying that Nathan B. McQuirter be required to appear and show cause, if anybe may have, why he should not be punished as for a contempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is ORDERED, ADJUDGED and DECREED by the Court that the said Nathan B. Maguister appear before this Court at / M. on the ____day of ______, 1964_, in the Courtroom of the Circuit Court of Baldwin County, Alabama, and show cause, if any homey have, why should not be punished as for a contempt. Let a copy of said petition and of this rule to show cause be served forthwith, personally, upon the said Nathan B. McOnirter by the Sheriff of Baldwin County, Alabama. Done this 6th day of April , 196. Judge, Circuit Court of Baldwin County, Alabama

VALDEMAR R. KREHER, : IN THE CIRCUIT COURT OF

Plaintiff, BALDWIN COUNTY, ALABAMA

. 0

-VS-

AT LAW

NATHAN B. McQUIRTER,

Defendant. : CASE NO. 4981

cause and shows that heretofore a notice was issued out of this Honorable Court by the Clerk thereof requiring the abovenamed defendant to file a statement of his assets as required by the Code of Alabama of 1940, as amended, Title 7 Section 903; that said notice was duly and personally served on the said defendant on to-wit the 28th day of September, 1963; that said defendant has willfully refused to file such statement although more than thirty (30) days from the service of such notice has passed.

WHEREFORE, the premises considered, the plaintiff petitions the Court that the said Nathan B. McQuirter be cited for contempt of Court and that he be required to appear before the court at a time and place to be fixed, to show cause, if any he have, why he should not be held in contempt of Court for willfully refusing to file such statement of assets. And your petitioner prays for such other and further relief as is proper in the premises.

LYONS, PIPES & COOK Attorneys for the Plaint / Ef

By: / Jolok /

Defendant may be served at Route 1, Box 78-E, Dpahne, Alabama.

ATTORNEYS AT LAW

SI7 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957) SAM W. PIPES, III WALTER M. COOK FRANK T. POPE, JR. GORDON S KAHN

IRWIN W.COLEMAN,JR. G.5AGE LYONS September 16, 1963

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

Re:

Valdemar R. Kreher v. Nathan B. McQuirter Case No. 4981, Circuit Court of Baldwin County, Alabama.

Dear Mrs. Duck:

The Sheriff of Baldwin County, Alabama has returned execution in the above-mentioned matter marked "No Property Found". It would be appreciated if you would direct a writ of discovery to the defendant who may be served at Route 1, Box 78, Daphne, Alabama.

Very truly yours,

LYONS, PIPES & COOK

Gordon B. Kahn∕

GBK:mb

Valdemar R. Kreher

IN THE CIRCUIT COURT OF

Plaintiff,

VS.

BALDWIN COUNTY, ALABAMA

Nathan B. McQuirter

Defendant.

AT LAW NO. 4981

TO:

Take notice, that, whereas, the Plaintiff in the above styled cause has requested, in writing, the undersigned, as Clerk of said Court, to issue notice to you, as Defendant, in the above styled cause, and in the judgment therein, requiring you to file a statement, in writing, under oath, of all your assets, as provided in Title 7, Section 903 of the 1940 county of Alabama and has filed said request in writing in this cause with the Clerk of this Court and it appearing from said request that the record in said cause that an execution was returned on the judgment in this cause on ______ August 14, 1963 ____, endorsed "No Property Found" by the Sheriff of Baldwin ____ County, Alabama;

Now, therefore, you are hereby required, within thirty days from the service hereof, to file in this Court, a statement, in writing, under oath, of all your assets, including money, choses in action, notes, bonds and accounts and all other property, real, personal, mixed or any interest therein, with detailed description of the same, the location and reasonable value of each item thereof, together with a detailed list or statement, of any and all liens, mortgages or encumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, encumbrances or mortgages.

WITNESS my hand this 17thday of September, 1963

Olich Duck

to the sheriff of Baldwin County, Alabama, greeting:

You are hereby commanded to serve the foregoing notice upon Nathan B.

McQuirter , Defendant, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

WIINESS by head this 17th day of September

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CASE NO. 4981

VALDEMAR R. KREHER

Plaintiff

NATHAN B. McQUIRTER, Route 1, Box 78 Daphne, Ala.

Defendant

Lyons, Pipes & Gook 517 First National Bk Bldg. Mobile 8, Alabama

ATTORNEYS AT LAW
517 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957) SAM W. PIPES, III WALTER M. COOK GORDON B. KAHN IEWIN W. COLEMAN, JR. G. SAGE LYONS

April 6, 1964

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

Re:

Valdemar R. Kreher v. Nathan B. McQuirter Case No. 4981 - Circuit Court of Baldwin County, Alabama.

Dear Mrs. Duck:

We have previously forwarded a motion to show cause why the defendant should not be held in contempt of court for failure to answer the writ of discovery in the abovementioned matter. As attorneys for the plaintiff, we respectfully request that service on this motion be withheld until further notice.

We sincerely appreciate your cooperation in this matter.

Very truly yours,

LYONS, PIPES & COOK

Gordon B. Kahn

GBK:mb

ATTORNEYS AT LAW 517 FIRST NATIONAL BANK BUILDING MOBILE, ALABAMA

36601

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
GORDON B. KAHN
IRWIN W. COLEMAN, JR.
G. SAGE LYONS
WILLIAM F. HORSLEY

May 7, 1964

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

Re:

Valdemar R. Kreher v. Nathan B. McQuirter Case No. 4981 - Circuit Court of Baldwin County, Alabama.

Dear Mrs. Duck:

We have previously requested for you to withhold further action on the Motion to Show Cause why the defendant should not be held in contempt of Court for failure to answer the Writ of Discovery in the above-mentioned matter. We now request that the motion be set for hearing and would appreciate you letting us know the date the matter is set.

Very truly yours,

LYONS PIPES & COOK

Gordon B. Kahn

GBK:mb

Just francisco 5

ATTORNEYS AT LAW 517 FIRST NATIONAL BANK BUILDING MOBILE, ALABAMA

36601

JOSEPH H. LYONS (1900-1957) SAM W. PIPES, III WALTER M. COOK GORDON B. KAHN RWIN W. COLEMAN, JR. G. SAGE LYONS WILLIAM F. HORSLEY

December 22, 1964

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

Re:

Valdemar R. Kreher v. Nathan D. McQuirter In the Circuit Court of Baldwin County, Alabama

Case No. 4981.

Dear Mrs. Duck:

As advised in our letter of November 17th, 1964, we requested that all action in this matter be dismissed in May of 1964 and our records indicate that Court costs in the amount of \$13.40 were paid on May 27th, 1964. the writ of discovery is still pending, it is our wish that it be vacated.

Very truly yours,

LYONS, PIPES & COOK

GBK:mb

cc:

Mr. E. G. Rickarby Attorney at Law Fairhope, Alabama

ATTORNEYS AT LAW

SIZ FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
FRANK T. POPE, JR.
GOROON B KAHN
IRWIN W. COLEMANJR.

December 26, 1961

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

Re: Valdemar R. Kreher, plaintiff v. Nathan B. McQuirter, Defendant. In the Circuit Court of Baldwin County, Alabama.

Dear Mrs. Duck:

We respectfully request that the enclosed suit be filed in the Circuit Court of Baldwin County, Alabama. We appreciate your assistance in this matter.

Very truly yours,

LYONS, PIPES AND COOK

Gordon B. Kahn

Encl.

GBK:mb

You Are Hereby Commanded to Summon_

THE STATE OF ALABAMA,

BALDWIN COUNTY

No.	4981	CIRCUIT COU	RT, BALDV	VIN C	OUNT	Z
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TO ANY SHERIFF OF THE STATE OF ALABAMA:

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to appear and	d plead, answe	r or demur, within t	hirty days from the se	ervice hereof, to the	complaint filed in the
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by		Valdemar	R. Kreher		
					Plaintiff
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Nathan B. McQuirter

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	Plaintiff's Attorney	TAYLOR WILKINS, Sheriff
	Plaintiff's Attorney	TAYLOR WILKINS, Sheriff DEPUTY SHERIFF
D	Plaintiff's Attorney	TAYLOR WILKINS, Sheriff