

VALDEMAR R. KREHER,
Plaintiff,

-vs-

NATHAN B. McQUIRTER,
Defendant.

X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4981.

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
LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Route One, Box 18
Daphne, Alabama

FILED

MAR 5 1962

ALICE J. DUCK, CLERK
REGISTER

VALDEMAR R. KREHER,

Plaintiff,

-vs-

NATHAN B. McQUIRTER,

Defendant.

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℥

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4981

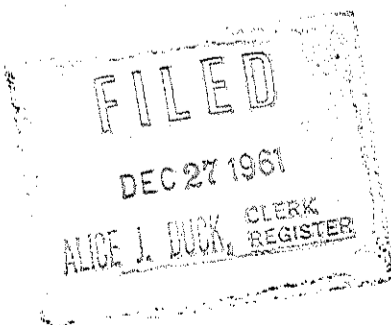
COUNT ONE

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 afore-said, 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
LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Route 1, Box 78
Daphne, Alabama



SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

}

No. 4981

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Nathan B. McQuirter

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
Nathan B. McQuirter, Defendant

by Valdemar R. Kreher

Plaintiff

Witness my hand this 27th day of December 1961

ES-1-4-62

Reine J. Hark
Clerk

No. 4981

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

VALDEMAR R. KREHER

vs.

Plaintiffs

NATHAN B. McQUIRTER

Defendants

SUMMONS and COMPLAINT

Filed 12-27-1961

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

12/27, 1961

Taylor Wilkins, Sheriff

I have executed this summons

this Jan 4, 1962

by leaving a copy with

Nathan McQuirter

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY W. O. Garner DEPUTY SHERIFF

Taylor Wilkins, Sheriff

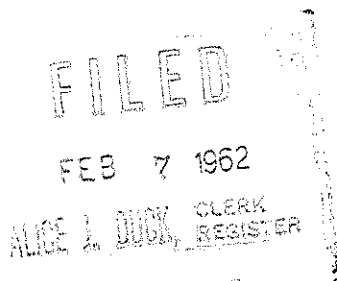
W. O. Garner, Deputy Sheriff

Daphne

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 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.



Lyons, Pipes and Cook
 LYONS, PIPES 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, Pipes and Cook
 LYONS, PIPES & COOK
 Attorneys for the Plaintiff

FILED

MAY 2 1962

ALICE J. DUCK, CLERK
 REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, 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

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

CERTIFICATE OF JUDGMENT

Printed by Moore Ptg. Co.

The State of Alabama, }
Baldwin County

CIRCUIT COURT Term, 19

VALDEMAR R. KREHER

Plaintiff

Vs.

NATHAN B. McQUIRTER

Defendant

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 8th day of February, 1962,

a judgment was rendered by said Court in the above stated cause, wherein

Valdemar R. Kreher

was Plaintiff and Nathan B. McQuirter

was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

DOLLARS

and for the sum of DOLLARS,

the costs in said suit, and that

are the Attorneys of record for the Plaintiff
in said cause.

Witness my hand this day of, 19

Clerk, Circuit Court, Baldwin County, Alabama

VALDEMAR R. KREHER,

Plaintiff,

-vs-

NATHAN B. McQUIRTER,

Defendant.

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IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4981.

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.


LYONS, PIPES AND COOK
Attorneys for the Plaintiff

VALDEMAR R. KREMER,

Plaintiff,

-vs-

NATHAN B. McQUIRTER,

Defendant.

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4981

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 13th, 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 afore-said, 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, Pives and Cook
LYONS, PIVES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Route 1, Box 78
Daphne, Alabama

ESTIMATE OF
REPAIR COST

U-S CHEVROLET CO., Inc.
121 So. Oak Hwy. GL 2-1661
RICHMOND, ALA.

NAME <i>Mr. Val Kasher</i>			ADDRESS	PHONE	DATE <i>3-22-61</i>
YEAR <i>5-9</i>	MAKE <i>Chev</i>	MODEL <i>4dr</i>	LICENSE NO.	SPEEDOMETER	MTR. No.
INSURANCE CARRIER <i>Home & Co.</i>			ADJUSTER <i>Burke</i>	PHONE	CAR LOCATED AT

OPERATIONS	PART No.	PARTS	LABOR
1 <i>W/S Clean</i>		12618	42
3 <i>new rubber</i>		2135	300
1 <i>front fender</i>		12135	
1 <i>front fender</i>		6195	
1 <i>W/S Paint & ad</i>		1595	
1 <i>W/S Paint</i>		8995	45
1 <i>front fender</i>		2430	
1 <i>front fender</i>		1082	
1 <i>front fender</i>		895	
1 <i>front fender</i>		405	
1 <i>front fender</i>		1335	
1 <i>front fender</i>		695	
1 <i>front fender</i>		320	
1 <i>front fender</i>		495	
1 <i>front fender</i>		1185	
1 <i>front fender</i>		175	
1 <i>front fender</i>		1565	
1 <i>front fender</i>		3260	
1 <i>R R door</i>		8695	45
1 <i>W/S Paint</i>		1225	
1 <i>W/S Paint</i>		675	
1 <i>W/S Paint</i>		505	
1 <i>W/S Paint</i>		1496	
1 <i>W/S Paint</i>		785	
1 <i>W/S Paint</i>		495	

INSURED PAYS \$ _____ INS. CO. PAYS _____ R. O. No. _____

INS CHECK PAYABLE TO _____

This check is an estimate, based on our inspection, and does not cover additional parts or labor which may be required after the work has been opened up. Occasionally, after work has started, worn, broken or damaged parts are discovered which are not evident on first inspection. Quotations on parts and labor are current and subject to change.

EST. MADE BY _____

AUTHORIZATION FOR REPAIR. You are hereby authorized to make the above specified repairs to the car described herein.

TOTALS

WRECKER
SERVICE

TAX

TOTAL OF
ESTIMATE

UNED

DATE

THE PATROLERS & REPAIRERS CO., CELINA, OHIO

U-J CHEVROLET CO., Inc.
151 So. Craft Hwy. OL 2-1661
PRICHARD, ALA.

ADDRESS		PHONE	DATE
MODEL	LICENSE No.	SPEEDOMETER	WTR. No.
ADJUSTER	PHONE	CAR LOCATED AT	

OPERATIONS	PART No.	PARTS	QTY.
2 R Door hinges		15.25	
lock away		8.45	
2 f fenders		46.80	20
on edge		9.70	
shirt		14.85	
contingent		3.60	
2 f bumper and		28.00	1.4
sup center		3.25	
valance		4.60	
mount bar		11.60	2.7
alt bar		3.40	
3 grill		11.20	1.0
on edge		5.00	
Panel up		8.95	2.7
hood loop		22.85	
Panel R		3.70	
front ground def		7.85	1.3
hood hinge		4.10	3
2 f wheel		16.85	
hub Cop		4.25	
storing Knecker		18.65	
Ball joint P.K. up & lower		16.20	
R frame up & f		10.25	
shift P.K. shift P.K.		5.60	40
low 1/4 shift P.K.		23.10	

U-J CO. PAYS
R. O. N.
This report is for inspection, and does not cover additional parts or labor which may be required after work has started, worn, broken or damaged parts are not evident on first inspection. Quotations on parts and labor are on request.

TOTALS
WRECKER SERVICE
TAX
TOTAL OF ESTIMATE

You are hereby authorized to make the above specified repairs to the car described herein.

DATE

turning Ray

46.65 35

for blower

426 14

Left Radiator per side

1275

Left side 5th & 6th O Panel

70

Left Case 5th & 6th O Panel

235 20

Frame & front end

12000

Paint & material

412

Wipers

4000

75.9

110803

less 10%

116621

TOTAL 941 87 222 60

3767

28765

TOTAL OF ESTIMATE

110921

[Handwritten signature]

DATE

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

March 8, 1962

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

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
-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, PIPES & COOK
 Attorneys for the Plaintiff

VALDEMAR R. KREHER, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- :
NATHAN B. McQUIRTER, : AT LAW
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 above-named 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

By: 

Gordon B. Kahn

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

VALDEMAR R. KREHER

Complainant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs:

NATHAN B. McQUIRTER

Respondent.

AT LAW
~~IN EQUITY~~ CASE NO. 4981

RULE TO SHOW CAUSE

This day came Hon. Gordon B. Kahn and filed his verified petition praying that Nathan B. McQuirter 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

ORDERED, ADJUDGED and DECREED by the Court that the said Nathan B. McQuirter appear before this Court at 10 A.M. on the 2nd day of April, 1964, in the Courtroom of the Circuit Court of Baldwin County, Alabama, and show cause, if any he may have, why he 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. McQuirter by the Sheriff of Baldwin County, Alabama.

Done this 6th day of April, 1964.

H. B. Kahn

Judge, Circuit Court of
Baldwin County, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4981

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Nathan B. McQuirter

to appear and plead, answer or demur, ^{10 A.M. 22 day of April, 1964} ~~within thirty days from the service thereof~~, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Nathan B. McQuirter Defendant

by Valdemar R. Kreher

Plaintiff

Witness my hand this 6th day of April 19 64

Alice J. Duck, Clerk

No. 4981

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

VALDEMAR R. KREHER

Plaintiffs

vs.

NATHAN B. McQUIRTER

Defendants

1 Summons and Complaint

~~2. Return to Show Cause~~

Filed April 6th 1964

Alice J. Duck

Clerk

Gordon B. Kahn

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.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4981

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Nathan B. McQuirter

to appear and plead, answer or demur, ~~within ten days from the date hereof~~ ^{10 A.M., 22 day of April, 1964}, to the complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Nathan B. McQuirter, Defendant

by Valdemar R. Kreher

Plaintiff

Witness my hand this 6th day of April, 1964

Alice J. Duck, Clerk

No. _____

Page _____

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.

VALDEMAR R. KREHER

Complainant,

vs:

NATHAN B. McQUITTER

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW
~~KENNEBOTH~~ CASE NO. 4981

RULE TO SHOW CAUSE

This day came Hon. Gordon B. Kohn and filed his verified petition praying that Nathan B. McQuitter 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

ORDERED, ADJUDGED and DECREED by the Court that the said Nathan B. McQuitter appear before this Court at 10 15 M. on the 6th day of April, 1964, in the Courtroom of the Circuit Court of Baldwin County, Alabama, and show cause, if any he may have, why he 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. McQuitter by the Sheriff of Baldwin County, Alabama.

Done this 6th day of April, 1964.



Judge, Circuit Court of
Baldwin County, Alabama

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 above-named 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

By:


Gordon B. Kahn

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

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

36601

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

FRANK T. POPE, JR.

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

September 16, 1963

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

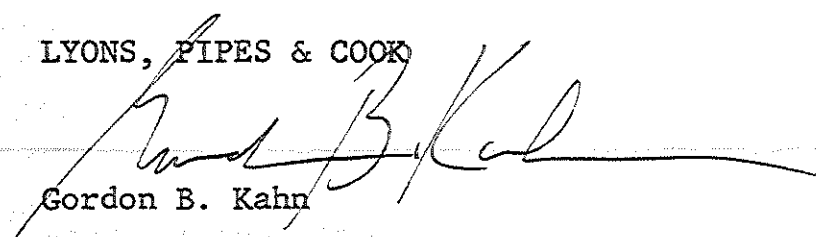
Re: Valdemar R. Kreher v. Nathan B. McQuirter
Case No. 4981, Circuit Court of Baldwin
County, Alabama.

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.

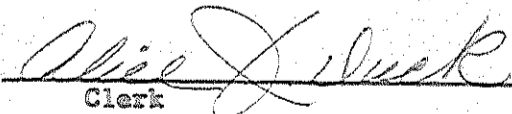
AT LAW NO. 4981

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 Code 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 17th day of September, 1963.


Clerk

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.

WITNESS my hand this 17th day of September, 1963.



CASE NO. 4981

VALDEMAR R. KREHER

Plaintiff

vs

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

Defendant

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

Received 17 day of Sept 1963
and on 28th day of Sept 1963

I served a copy of the within S & C
on Nathan B. McQuirter

By service on _____

TAYLOR WILKINS, Sheriff

By Fred Serber D. S.
Deputy Sheriff

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff
BY Fred Serber
DEPUTY SHERIFF

LYONS, PIPES & COOK

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

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

36601

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.

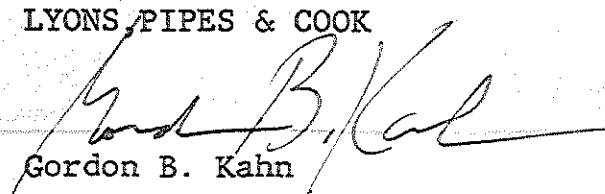
Dear Mrs. Duck:

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 above-mentioned 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

LYONS, PIPES & COOK

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

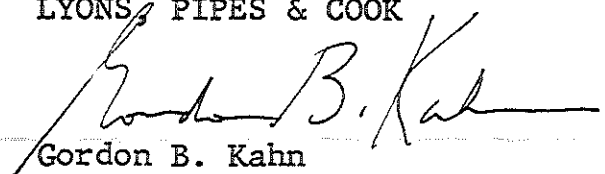
Re: Valdemar R. Kreher v. Nathan B. McQuirter
Case No. 4981 - Circuit Court of Baldwin
County, Alabama.

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

Handwritten note:
Find from 5-14
a 10 PM

LYONS, PIPES & COOK

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
IRWIN W. COLEMAN, JR.
G. SAGE LYONS
WILLIAM F. HORSLEY

36601

December 22, 1964

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

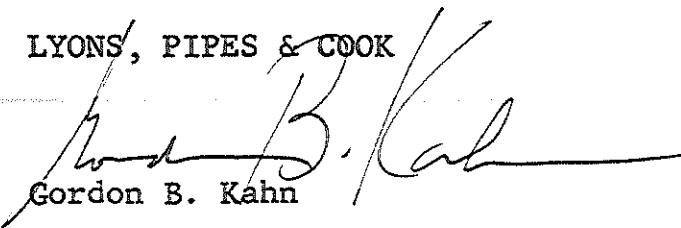
Re: Valdemar R. Kreher
v. Nathan D. McQuirter
In the Circuit Court of
Baldwin County, Alabama
Case No. 4981.

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. If the writ of discovery is still pending, it is our wish that it be vacated.

Very truly yours,

LYONS, PIPES & COOK


Gordon B. Kahn

GBK:mb

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

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

FRANK T. POPE, JR.

GORDON D. KAHN

IRWIN W. COLEMAN, JR.

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

GBK:mb

Encl.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4981

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon **Nathan B. McQuirter**

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

Nathan B. McQuirter

, Defendant.

by

Valdemar R. Kreher

, Plaintiff.

Witness my hand this

9th

day of

March

19 62.

Alvin J. Duck, Clerk

No. 4981

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

VALDEMAR R. KREHER

vs.

Plaintiffs

NATHAN B. McQUIRTER

Defendants

SUMMONS and COMPLAINT

Filed 3-9 1962

Alice J. Duck

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3/9, 1962

Sheriff

I have executed this summons

this March 30, 1962

by leaving a copy with

Nathan B. McQuirter

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY W. O. Garner
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. O. Garner Deputy Sheriff

Belmont