

DAVIS & ROESENER WHOLESALE FLORISTS, INC., a California corporation,

PLAINTIFF,

VS:

MR. V. C. TYLER & MRS. V. C. TYLER,
d/b/a TYLER WHOLESALE FLORIST,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7779

MOTION FOR WRIT OF DISCOVERY

TO THE HONORABLE ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

WHEREAS, IN THE ABOVE STYLED CAUSE THE PLAINTIFF RECOVERED A JUDGEMENT AGAINST THE SAID DEFENDANTS MR. V. C. TYLER & MRS. V. C. TYLER, d/b/a TYLER WHOLESALE FLORIST ON THE 19th DAY OF February, 1968,

FOR THE SUM OF \$ 8,300.00 - - - - - BESIDES THE COST OF SAID CAUSE; WHEREAS EXECUTION WAS ISSUED ON THE SAID JUDGEMENT AGAINST THE SAID MR. V. C. TYLER & MRS. V. C. TYLER, AND THEREAFTER THE SAID EXECUTION WAS RETURNED BY THE SHERIFF OF BALDWIN COUNTY, ALABAMA WITH THE ENDORSEMENT THEREON "NO PROPERTY FOUND" AND THE SAID JUDGEMENT REMAINS UNPAID AND UNSATISFIED,

NOW THEREFORE, THIS IS TO REQUEST YOU AS CLERK OF SAID COURT TO ISSUE A NOTICE TO THE SAID MR. V. C. TYLER & MRS. V. C. TYLER REQUIRING them TO FILE IN THE CIRCUIT COURT OF SAID COUNTY, WITHIN 30 DAYS FROM THE SERVICE OF SAID NOTICE, A STATEMENT IN WRITING, UNDER OATH, OF ALL OF THE ASSETS OF THE SAID DEFENDANTS INCLUDING MONEY, CHOSSES IN ACTION, BONDS AND ACCOUNTS, AND ALL OTHER PROPERTY, REAL, PERSONAL OR MIXED OR ANY INTEREST THEREIN, WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED STATEMENT OF ALL LIENS, MORTGAGES OR ENCUMBRANCES THEREON, SHOWING THE AMOUNTS DUE UPON EACH, AND OWNER OR HOLDER OF SUCH LIENS, MORTGAGES OR ENCUMBRANCES.

THE SAID DEFENDANTS RESIDES AT
GULF HACIENDA, GULF SHORES, ALA. IN THE COUNTY OF BALDWIN
STATE OF ALABAMA.

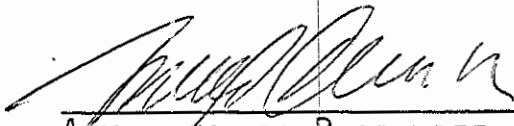
DATED THIS 16th DAY OF July, 1968

FILED

JUL 17 1968

ALICE J. DUCK

CLERK
REGISTER


ATTORNEY FOR PLAINTIFF

FOREST A. CHRISTIAN
Attorney At Law
P. O. DRAWER 190
FOLEY, ALABAMA 36535

DAVIS & ROESENER WHOLESALE FLORISTS, INC., A California corporation,
PLAINTIFF,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS:

AT LAW

MR. V. C. TYLER, and MRS. V. C. TYLER,
D/B/A TYLER WHOLESALE FLORIST,
DEFENDANTS.

CASE NO. 7779

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: ~~MR. V. C. TYLER & MRS. V. C. TYLER, d/b/a TYLER WHOLESALE FLORIST, and individually,~~

TAKE NOTICE, WHEREAS, THE PLAINTIFF HEREIN HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF THIS COURT, TO ISSUE NOTICE TO YOU AS DEFENDANT HEREIN, REQUIRING YOU TO FILE A STATEMENT, IN WRITING, UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN TITLE 7, SECTION 903, ALABAMA CODE 1940, AS AMENDED AND IT APPEARING FROM THE SAID REQUEST AND THE RECORD IN THE SAID CAUSE THAT AN EXECUTION WAS RETURNED ON THE JUDGEMENT IN THIS CAUSE ON THE 26th DAY OF June, 19 68, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID ~~MR. V. C. TYLER & MRS. V. C. TYLER~~ ARE HEREBY REQUIRED, WITHIN 30 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, OR MIXED, OR ANY INTEREST THEREIN WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED LIST OF STATEMENTS, OR ANY AND ALL LIENS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS THE 17th DAY OF July, 1968.

Alice J. Welch
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY ~~COMMANDED~~ TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED MR. V. C. TYLER and MRS. V. C. TYLER AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Alice J. Welch
CLERK

TO BE SERVED ON MRS. V.C. TYLER AT GULF HACIENDA, GULF SHORES, ALA.

DAVIS & ROESENER WHOLESALE FLORISTS, X
INC., A California corporation, X
PLAINTIFF, X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS:

AT LAW

MR. V. C. TYLER, and MRS. V. C. TYLER, X
D/B/A TYLER WHOLESALE FLORIST, X
DEFENDANTS. X

CASE NO. 7779

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: ~~MR. V. C. TYLER & MRS. V. C. TYLER, d/b/a TYLER WHOLESALE~~
~~FLORIST, and individually,~~
TAKE NOTICE, WHEREAS, THE PLAINTIFF HEREIN HAS REQUESTED
IN WRITING, THE UNDERSIGNED, AS CLERK OF THIS COURT, TO ISSUE
NOTICE TO YOU AS DEFENDANT HEREIN, REQUIRING YOU TO FILE A STATE-
MENT, IN WRITING, UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN
TITLE 7, SECTION 903, ALABAMA CODE 1940, AS AMENDED AND IT APPEAR-
ING FROM THE SAID REQUEST AND THE RECORD IN THE SAID CAUSE THAT
AN EXECUTION WAS RETURNED ON THE JUDGEMENT IN THIS CAUSE ON THE
~~26th~~ DAY OF ~~June~~, 19 ~~68~~, ENDORSED "NO PROPERTY
FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN
THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID ~~MR. V. C. TYLER & MRS. V. C. TYLER~~
ARE HEREBY REQUIRED, WITHIN 30 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, OR MIXED, OR
ANY INTEREST THEREIN WITH A DETAILED DESCRIPTION OF THE SAME, THE
LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH
A DETAILED LIST OF STATEMENTS, OR ANY AND ALL LIENS, MORTGAGES
OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS THE ~~17th~~ DAY OF ~~July~~,
19~~68~~.

Alice J. Whick
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE
UPON THE ABOVE NAMED ~~MR. V. C. TYLER and~~
~~MRS. V. C. TYLER~~ AND MAKE DUE
RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Alice J. Whick
CLERK

TO BE SERVED ON MR. V. C. TYLER AT GULF Hacienda, Gulf Shores, Ala.

DAVIS & ROESENER WHOLESALE FLORISTS, X
INC., A California corporation, X
PLAINTIFF, X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS:

AT LAW

MR. V. C. TYLER, and MRS. V. C. TYLER, X
D/B/A TYLER WHOLESALE FLORIST, X
DEFENDANTS. X

CASE NO. 7779

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: MR. V. C. TYLER & MRS. V. C. TYLER, d/b/a TYLER WHOLESALE
FLORIST, and individually,
TAKE NOTICE, WHEREAS, THE PLAINTIFF HEREIN HAS REQUESTED
IN WRITING, THE UNDERSIGNED, AS CLERK OF THIS COURT, TO ISSUE
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26th DAY OF June, 19 68, ENDORSED "NO PROPERTY
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THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID MR. V. C. TYLER & MRS. V. C. TYLER
ARE HEREBY REQUIRED, WITHIN 30 DAYS FROM THE SERVICE HEREOF, TO
FILE IN THIS COURT A STATEMENT, IN WRITING, UNDER OATH OF ALL
YOUR ASSETS, INCLUDING MONEY, CHOSSES IN ACTION, NOTES, BONDS AND
ACCOUNTS, AND ALL OTHER PROPERTY, REAL, PERSONAL, OR MIXED, OR
ANY INTEREST THEREIN WITH A DETAILED DESCRIPTION OF THE SAME, THE
LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH
A DETAILED LIST OF STATEMENTS, OR ANY AND ALL LIENS, MORTGAGES
OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS THE 17th DAY OF July,
1968.

Rebecca J. Albrecht
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE
UPON THE ABOVE NAMED MR. V. C. TYLER and
MRS. V. C. TYLER AND MAKE DUE
RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Rebecca J. Albrecht
CLERK

Duffy & Sons

no. 7779

Received 17 day of July 1968
at on day of 19
I have served a copy of the within what case
Mrs. U.C. Tyler
U.C. Tyler
service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

*Davis & Roeseener Wholesale
Florists*

VS

*Mr. U.C. Tyler &
Mrs. U.C. Tyler
968-7113
Chapleau*

*Ret. Not Found
7/19/68
Jim Eastman, D.S.*

FILED

JUL 17 1968

ALICE J. DUCK CLERK
REGISTER

F.A. Christian

STATEMENT

LAW OFFICE OF
FOREST A. CHRISTIAN

CLERK OF COURT
BAY MINETTE, ALA

FILED

JUL 19 1968

ALICE J. DUCK

CLERK
REGISTER

P. O. DRAWER 190
FOLEY, ALABAMA 36535

Re Davis & Rossner
VS
Mr + Mrs V S Tyler

Dear Mrs Duck: H 7779

I send you notice for writ
of Habeas Corpus yesterday.

I will personally guarantee
Court Costs in this

Case. Please allow for Plaintiff

DAVIS & ROESENER WHOLESALE)
FLORISTS, INC., a California)
corporation,)

PLAINTIFF,)

-vs-)

MR. V. C. TYLER, and MRS. V.)
C. TYLER, d/b/a TYLER WHOLESALE)
FLORIST,)

DEFENDANT.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7779


Come the Defendants in the above styled cause and demur to the Bill of Complaint heretofore filed therein and to each court thereof separately and severally and as grounds for such demurrer, show separately and severally as follows:

1. The Complaint does not state a cause of action.



Attorney for Defendants

Defendants respectfully demand
trial by jury



Attorney for Defendants

FILED

FEB 19 1968

ALICE J. DUCK C. J. R. RECORDED

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons MR. V. C. TYLER, and MRS. V. C. TYLER, d/b/a TYLER WHOLESALE FLORIST, 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, Alabama, at the place of holding same by DAVIS & ROESENER WHOLESALE FLORISTS, INC., a California corporation.

Witness my hand this the 10 day of October, 1967.

Forest A. Christian
Clerk

** **

COMPLAINT

DAVIS & ROESENER WHOLESALE
FLORISTS, INC., a California
corporation,

PLAINTIFF,

VS:

MR. V. C. TYLER, and MRS. V.
C. TYLER, d/b/a TYLER WHOLESALE
FLORIST,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7779

COUNT I

The Plaintiff claims of the Defendants EIGHT THOUSAND SIXTY-FOUR & 50/100 DOLLARS (\$8,064.50), due from them by account on, to wit: the 1st day of July, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendants EIGHT THOUSAND SIXTY-FOUR & 50/100 DOLLARS (\$8,064.50), due from them on account stated between the Plaintiff and the Defendants on, to wit: the 1st day of July, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant EIGHT THOUSAND SIXTY-FOUR & 50/100 DOLLARS (\$8,064.50), due from them for merchandise, goods and chattels sold by the Plaintiff to the Defendants on, to wit: the 1st day of July, 1967, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 26th of September, 1967.

Defendants address is:

c/o Gulf Hacienda
Gulf Shores, Alabama

Forest A. Christian
Forest A. Christian, Attorney for Plaintiff

FILED

OCT 10 1967

516

ALICE J. DUCH

CLERK
REGISTER

Statement

DAVIS and ROESENER WHOLESALE FLORISTS, INC.

160 ADA AVENUE
MOUNTAIN VIEW, CALIFORNIA 94041
TELEPHONE (415) 968-1006

TYLER WHOLESALE FLORIST

125½ WALNUT

HATTIESBURG, MISSISSIPPI

DATE	DESCRIPTION	CHARGES	V	CREDITS	BALANCE
12/2/66	AMOUNTS FORWARDED	<i>Balance Forward</i>			6015 31
12-5	1101	117 50			6192 83
12-9	1127	146 00			6338 83
12-12	1136	222 50			6561 33
12-14	Om. Recd.			1495 25	5065 41
12-16	1157	223 50			5288 90
12-19	1166	223 50			5512 40
12-24	1194	182 00			5694 40
12-27	1211	246 50			5940 90
12-31	1221	250 00			6190 90
1-3-67	1229	192 50			6383 40
1-7	1245	241 00			6624 40
1-9	1249	244 00			6868 40
1-13	1266	142 00			7010 40

1% will be added each month to all delinquent accounts

DAVIS AND ROESENER
MT. VIEW, CALIF.

PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

Statement

DAVIS and ROESENER WHOLESALE FLORISTS, INC.

160 ADA AVENUE
MOUNTAIN VIEW, CALIFORNIA 94041
TELEPHONE (415) 968-1006

TYLER WHOLESALE FLORIST

125½ WALNUT

HATTIESBURG, MISSISSIPPI

DATE	DESCRIPTION	CHARGES	V	CREDITS	BALANCE
1/13/67	AMOUNTS FORWARDED	Balance Forward			7010 40
1-16	1279	231 00			7241 40
1-17	On Acct.			1975 10	5266 30
1-20	1305	111 25			5377 55
1-23	1319	187 00			5564 55
1-27	1336	145 00			5709 55
1-30	1349	111 25			5820 80
2-3	1363	196 00			6016 80
2-6	1378	197 25			6214 05
2-10	1401	222 50			6436 55
2-13	1418	251 50			6688 05
2-17	On Acct.			1629 40	5058 65
2-17	1447	264 00			5322 65
2-20	1462	197 25			5519 90

1% will be added each month to all delinquent accounts

DAVIS AND ROESENER
MT. VIEW, CALIF.

PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

Statement

DAVIS and ROESENER WHOLESALE FLORISTS, INC.

160 ADA AVENUE
MOUNTAIN VIEW, CALIFORNIA 94041
TELEPHONE (415) 968-1006

. TYLER WHOLESALE FLORIST

125½ WALNUT

HATTIESBURG, MISSISSIPPI

DATE	DESCRIPTION	CHARGES	V	CREDITS	BALANCE
2/20/67	AMOUNTS FORWARDED	<i>Balance Forward</i>			5519 90
2-24	1478	110 00			5629 90
2-27	1484	237 50			5867 40
3-3	1514	189 50			6056 90
3-6	1534	106 50			6163 40
3-10	1550	110 00			6273 40
3-13	1562	104 50			6377 90
3-14	On Acct.			1000 00	5377 90
3-17	1587	127 50			5505 40
3-20	1594	298 60			5804 00
3-24	1621	160 00			5964 00
3-27	1627	148 00			6112 00
3-31	1651	148 00			6260 00
4-3	1661	198 50			6458 50

1% will be added each month to all delinquent accounts

DAVIS AND ROESENER
MT. VIEW, CALIF.

⬆
PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

Statement

DAVIS and ROESENER WHOLESALE FLORISTS, INC.

160 ADA AVENUE
MOUNTAIN VIEW, CALIFORNIA 94041
TELEPHONE (415) 968-1006

• TYLER WHOLESALE FLORIST

125½ WALNUT

HATTIESBURG, MISSISSIPPI

DATE	DESCRIPTION	CHARGES	V	CREDITS	BALANCE
4/3/67	AMOUNTS FORWARDED				6458 50
4-7	1679	165 50			6624 00
4-10	1693	140 00			6764 00
4-14	1713	145 00			6909 00
4-17	1731	192 50			7101 50
4-21	1748	106 50			7208 00
4-24	1759	183 50			7391 50
4-28	1793	106 50			7498 00
5-1	1808	192 50			7690 50
5-5	1834	190 00			7880 50
5-8	1846	184 00			8064 50

1% will be added each month to all delinquent accounts

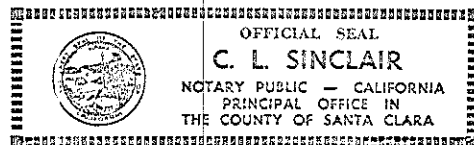
DAVIS AND ROESENER
MT. VIEW, CALIF.

PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

Z244709DUGASOAVENUEXXXXXXXXXXEASTX8ALDOXXAKTO.XC8LI(FORMAXXXXXXOTEXEPHONEDAVEN65FXIC595DX

Telephone: 968-1006

My Commission Expires: MY COMMISSION EXPIRES MAY 4, 1968



1846

5-8-67

160 ADA AVE.

MOUNTAIN VIEW, CALIFORNIA 94041

PHONE (415) 968-1006

SOLD TO

Iyer whole
Hatterburg Miss.

[illegible]

1% WILL BE ADDED EACH MONTH TO ALL DELINQUENT ACCOUNTS.

RECEIVED BY

1834

Davis & Roesener Wholesale Florists, Inc.

S
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Tyler Wheeler
Hattiesburg Miss

[illegible]

1% WILL BE ADDED EACH MONTH TO ALL DELINQUENT ACCOUNTS.

RECEIVED BY

1808

5-1-67

160 ADA AVE.
MOUNTAIN VIEW, CALIFORNIA 94041
PHONE (415) 968-1006

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Iyer whole
Hattusung Miss

[illegible]

RECEIVED BY

1793

4-28-67

160 ADA AVE.

MOUNTAIN VIEW, CALIFORNIA 94041

PHONE (415) 968-1006

SOLD TO

Sylvia Wheeler
Hattisburg Miss

[illegible]

1% WILL BE ADDED EACH MONTH TO ALL DELINQUENT ACCOUNTS.

RECEIVED BY

1759

4-24-67

160 ADA AVE.

MOUNTAIN VIEW, CALIFORNIA 94041

PHONE (415) 968-1006

SOLD TO

Tyler Wheeler
Hallsburg Miss.

[illegible]

1% WILL BE ADDED EACH MONTH TO ALL DELINQUENT ACCOUNTS.

RECEIVED BY