

MEMO-LETTER

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

MESSAGE REPLY

TO

Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

January 19, 1968

Re: Mason Plan Company, Inc. vs.

Wade B. Thompson

Dear Mrs. Duck:

Enclosed please find Bill of Complaint  
to be filed, together with copy of same  
and Summons to be served.

Sincerely,

*John V. Duck*  
(K4)

SIGNED

SIGNED

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE March 15, 1968

Re: Mason Plan vs. Wade B. Thompson

Civil No. 7965

Dear Mrs. Duck:

Enclosed please find note sued on in  
captioned case. Would you please have  
the Judge issue a Judgment in the amount  
of \$1,100.00 plus \$220.00 attorneys fees.

Sincerely,

*John V. Duck*  
(JVD)

SIGNED

SIGNED

MASON PLAN COMPANY, INC., a	X	
corporation		
Plaintiff	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
WADE B. THOMPSON	X	AT LAW CASE NO. 7965
Defendant	X	
	X	

Comes the defendant in the above styled cause and respectfully files this, his answer and respectfully asks that it be taken nunc pro tunc.

Your defendant says under oath as follows:

As of this date, he has been unemployed since December 24, 1968; that he has no money in the bank.

He has an action in Florida pending for damages to an automobile which he was driving and for personal injuries suffered in the accident.

He has no notes payable to him which he is holding. He owns no bonds and has no outstanding accounts payable to him. He owns no real property, though he is presently involved in an action for the purchase of a home.

He further states that he owns a 1955 Ford which was involved in the accident and has not been repaired. He has no other personal property of any value.

In regard to the said proposed purchase, the lien provided by the Circuit Court of Baldwin County is in the amount of \$6700.00 with interest at 7% payable \$50.00 per month including interest, being Case No. 9718.

Your defendant owns no other property.

The defendant's unemployment is caused primarily by extreme high blood pressure. He is presently under the care of Dr. Adams of Robertsdale whose treatment is slowly benefiting your said defendant.

Wade B. Thompson  
Wade B. Thompson

Sworn to and subscribed before me this 10 day of March 1969.

FILED

MAR 11 1969

ALICE J. DICK CLERK  
REGISTER

Le D. Thompson  
Notary Public, Baldwin County, Alabama

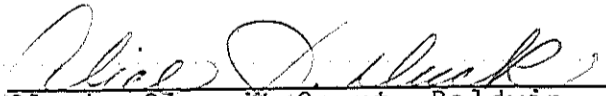
MASON PLAN COMPANY, INC., a	)	IN THE CIRCUIT COURT OF
corporation,	)	BALDWIN COUNTY, ALABAMA
Plaintiff,	)	AT LAW, NO. 7965
vs.	)	
WADE B. THOMPSON,	)	
Defendant.	)	

T0: Wade B. Thompson  
Rt. 1, Box 49  
Loxley, Alabama

Upon written request of the Plaintiff filed in the above entitled cause, you are hereby required to file in said Circuit Court of Baldwin County, Alabama, within thirty days from the service of this notice on you, 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 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, mortgages or encumbrances.

WITNESS my hand, this the 2nd day of May, 1968.

Attest:

  
Clerk, Circuit Court, Baldwin  
County, Alabama

STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF BALDWIN COUNTY - GREETINGS:

You are hereby commanded to serve a copy of the above notice on WADE B. THOMPSON at Rt. 1, Box 49, Loxley, Alabama, and make due return thereof according to law.

WITNESS My hand this the 2nd day of May, 1968.

Attest:

Alice D. Duck  
Clerk, Circuit Court, Baldwin County,  
Alabama.

Issued the 2nd day of May, 1968.

4-6-17-68

CASE NO. 7965

MASON PLAN COMPANY, INC., a  
corporation,

Plaintiff,

vs.

WADE B. THOMPSON,

Defendant

WRIT OF DISCOVERY

Serve copy on Defendant:

Wade B. Thompson  
Rt. 1, Box 49  
Loxley, Alabama

Issued the 2nd day of

May, 1968.

*John V. Duck, Atty.*

received 2 day of May 1968  
and on 17 day of May 1968

I served a copy of the within Whitey Duck  
on Wade B. Thompson

By service on

TAYLOR WILKINS, Sheriff

By *Wade B. Thompson*

*Loxley*

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY *Wade B. Thompson*  
DEPUTY SHERIFF

MASON PLAN COMPANY, INC., a )  
corporation, )

Plaintiff, )

vs. )

WADE B. THOMPSON, )

Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 7965

ORDER SETTING DAY TO HEAR  
PETITION FOR CONTEMPT

Upon consideration filed herein by the above named Plaintiff on the 20<sup>th</sup> day of February, 1969, praying that the said Defendant be cited as for a contempt, it is

ORDERED, ADJUDGED AND DECREED by the Court that the said WADE B. THOMPSON do, be and appear before the Court on the 17<sup>th</sup> day of March, 1969 at 10:30 A. M. and show cause, if any he have, why he should not be held in contempt for willfully refusing to file said statement of assets as required by law.

Let a copy of said Petition and this Decree be served upon the said Defendant.

DONE this the 20<sup>th</sup> day of February, 1969.

J. J. Mason  
CIRCUIT JUDGE

FILED

Defendant can be served at Rt. 1, Box 49,  
Loxley, Alabama

FEB 20 1969

ALEX J. DECK

CLERK  
REGISTER

MASON PLAN COMPANY, INC., a )  
corporation, )

Plaintiff, )

vs. )

WADE B. THOMPSON, )

Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 7965

Comes now the Plaintiff in the above styled cause, and shows that on, to-wit: the 2<sup>nd</sup> day of May, 1968, 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 Code 1940, Title 7, Section 903; that said notice was duly and personally served on the said Defendant on the 17<sup>th</sup> day of June, 1968; that the said Defendant has willfully refused to file such statement.

WHEREFORE, the premises considered, the Plaintiff petitions the Court that the said WADE B. THOMPSON 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.

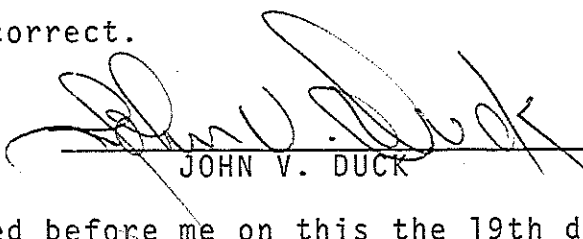
And Petitioner will ever pray.

  
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

BALDWIN COUNTY


Personally appeared before me, the undersigned authority, JOHN V. DUCK, who being by me first duly and legally sworn, doth depose and say on oath as follows: That the facts stated in the above Petition are true and correct.

  
JOHN V. DUCK

Sworn to and subscribed before me on this the 19th day of February, 1969.

FEB 20 1969  
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PAGE 428

  
NOTARY PUBLIC

24-2-21-69

MASON PLAN COMPANY, INC., a )  
corporation, )

Plaintiff, )

vs. )

WADE B. THOMPSON, )

Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW, NO. 7965

TO: Wade B. Thompson  
Rt. 1, Box 49  
Loxley, Alabama

Upon written request of the Plaintiff filed in the above entitled cause, you are hereby required to file in said Circuit Court of Baldwin County, Alabama, within thirty days from the service of this notice on you, 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 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, mortgages or encumbrances.

WITNESS my hand, this the 2nd day of May,  
1968.

Attest:

Clerk, Circuit Court, Baldwin  
County, Alabama

STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF BALDWIN COUNTY - GREETINGS:

You are hereby commanded to serve a copy of the above notice on WADE B. THOMPSON at Rt. 1, Box 49, Loxley, Alabama, and make due return thereof according to law.

WITNESS My hand this the \_\_\_\_\_ day of \_\_\_\_\_, 1968.

Attest:

Clerk, Circuit Court, Baldwin County, Alabama

Issued the \_\_\_\_\_ day of \_\_\_\_\_, 1968.

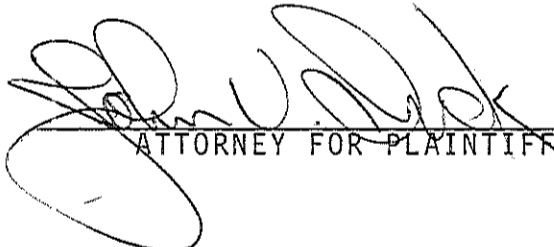
MASON PLAN COMPANY, INC., a	)	IN THE CIRCUIT COURT OF
corporation,	)	BALDWIN COUNTY, ALABAMA
Plaintiff,	)	AT LAW, NO. 7965
vs.	)	
WADE B. THOMPSON,	)	
Defendant.	)	

The Plaintiff herein having recovered on the 19th day of March, 1968, a Judgment against the Defendant in the above styled cause for the sum of ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS and costs, and such execution having been returned endorsed by the Sheriff of Baldwin County, Alabama, "no property found", the Plaintiff now requests in writing that the Clerk of this Court will issue a notice to the above named Defendant requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character and description and wheresoever located as provided by Code 1940, Title 7, Section 903.

**FILED**

MAY 2 1968

**ALICE J. DUCK** CLERK  
REGISTER

  
ATTORNEY FOR PLAINTIFF

MASON PLAN COMPANY, INC., a	)	IN THE CIRCUIT COURT OF
corporation,	)	BALDWIN COUNTY, ALABAMA
Plaintiff,	)	AT LAW
vs.	)	
WADE B. THOMPSON,	)	
Defendant.	)	

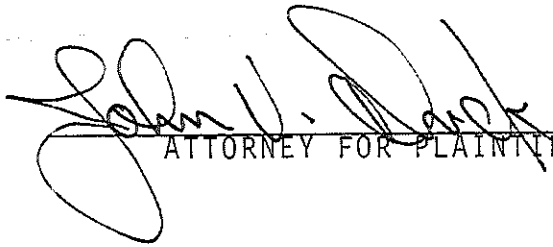
COUNT ONE

Plaintiff claims of the Defendant the sum of ONE THOUSAND ONE HUNDRED (\$1,100.00) DOLLARS due by promissory note made by the Defendant on, to-wit: the 7th day of January, 1967 and payable in twenty (20) equal installments of FIFTY-FIVE (\$55.00) DOLLARS each.

That in and by the terms of said note, that failure on the part of the Defendant to pay any installment or to fulfill any of the obligations herein undertaken shall, at the option of the holder without demand or notice, mature all remaining installments and the Plaintiff now claims the benefit of said option and declares the entire balance due and payable.

That in and by the terms of said note, the Defendant agreed to pay all costs of collection, including a reasonable attorneys fee, and the Plaintiff claims the further and additional sum of TWO HUNDRED TWENTY (\$220.00) DOLLARS as a reasonable attorneys fee.

That in and by the terms of said note, the Defendant waived all right of exemption under the laws and constitution of the State of Alabama, and the Plaintiff now claims the benefit of said waiver.

  
ATTORNEY FOR PLAINTIFF

**FILED**

JAN 22 1968

ALICE J. DUCK CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ..... WADE B. THOMPSON

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.....

..... WADE B. THOMPSON....., Defendant.....

by ..... MASON PLAN COMPANY, INC.....

....., Plaintiff.....

Witness my hand this..... 22..... day of..... January 19. 68

....., Clerk

Ex 1-24-68

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STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

MASON PLAN COMPANY, INC.  
a corporation,

Plaintiffs

vs.

MADE B. THOMPSON  
Defendants

SUMMONS AND COMPLAINT

Filed Jan 22 1968

Christina B. Clark Clerk

JOHN V. DUCK  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Loxley, Alabama

**RECEIVED**

Received in Office  
JAN 22 1968

JAMOR WILKINS 19  
SHERIFF

I have executed this summons

Sheriff

this 1-24 1968  
by leaving a copy with

Carole Thompson

40

4.00

Carole Thompson  
DEPUTY SHERIFF

James H. Hester  
Deputy Sheriff

Deputy