

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P. O. DRAWER 190  
AREA CODE 205 - PHONE 949-2201  
FOLEY, ALABAMA 36535

December 10, 1968

Hon. Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama 36507

Re: Monsanto Company  
Vs: Carlton Grubbs  
Case No. 8103

Dear Judge Mashburn:

On September 21, we wrote you as follows:

"Kindly render a judgment on a sworn to itemized statement of account for the principal amount of \$2,384.76, plus \$21.00 interest, for a total of \$2,405.76."

It does not appear that we have received the Certificate of Judgment. Would appreciate your sending information concerning it.

Cordially yours,



FOREST A. CHRISTIAN

STATEMENT

LAW OFFICE OF

FOREST A. CHRISTIAN

Hon. Telfair Mashburn  
Judge of Circuit Court  
Bay Minette, Alabama

P. O. DRAWER 190

FOLEY, ALABAMA 36535

May 25, 1971

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Monsanto Agricultural Co. vs Carolton Grubbs #8103 on account

Since it appears from property searches by Ertzinger and diligent work by the Sheriff's department that the defendant, Grubbs, has no property, we asked for a discovery of assets of judgment creditors sometime ago and are permitting you to dismiss this with prejudice.

  
FOREST A. CHRISTIAN

DISCOVERY NOTICE FOR ASSETS OF JUDGMENT DEBTOR

MONSANTO COMPANY, X  
PLAINTIFF, X IN THE CIRCUIT COURT OF  
VS: X BALDWIN COUNTY, ALABAMA  
CARLTON GRUBBS, X AT LAW  
DEFENDANT. X CASE NO. 8103

TO: CARLTON GRUBBS, Route 1, Box 146, Robertsedale,  
Alabama 36567:

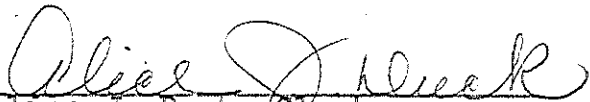
Take Notice, That, Whereas, the MONSANTO COMPANY, the Plaintiff, in the above entitled cause has requested in writing, the undersigned, as Clerk of Court, to issue notice to you as Defendant, Judgment Debtor, in the above entitled cause and in the judgment therein, requiring you to file the statement, in writing, under oath, of all your assets, as provided in the Act of the Legislature of Alabama, approved September 28th, 1915, "To provide for the discovery of assets of judgment debtors, and to facilitate the enforcement of or collection of judgments in Courts of Law and Equity in this State," and has filed said request, in writing, in this cause with the undersigned as Clerk of this Court, and it appearing from said request and the record in said cause that an execution was returned on the judgment in this cause on the 6th day of April, 1970, endorsed "No Property Found," by the Sheriff of Baldwin County, and that you reside in the State of Alabama.

NOW, THEREFORE, you, the said Judgment Debtor, CARLTON GRUBBS, 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 or mixed, or any interest therein,

Discovery Notice for Assets of Judgment Debtor-Page Two

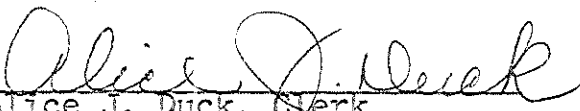
with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed list or statement, of any and all liens, mortgages or incumbrances thereon.

WITNESS my hand this the 4 day of Nov., 1970.

  
Alice J. Duck, Clerk

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to serve the foregoing notice upon the above named CARLTON GRUBBS, Route 1, Box 146, Robertsedale, Alabama 36567, and made due return of your said service of this notice.

  
Alice J. Duck, Clerk

8103

Monsanto Co.

vs.

Carlton Grubbs

Writ of Discovery

FILED

NOV 4 1970

ALICE J. DUCK CLERK  
REGISTER

J. A. Christie

Shediff claims 60 miles at  
Ten Cents per mile Total \$ 6.00  
BY TAYLOR WILKINS, Sheriff  
NALL  
DEPUTY SHERIFF

Received 5 day of Nov 19 70  
and on 7 day of Nov 19 70  
I served a copy of this writ on Carlton Grubbs  
at Carlton Grubbs

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By J. A. Christie D.S.

DISCOVERY OF ASSETS OF JUDGMENT DEBTORS

MONSANTO COMPANY,                   X  
                    PLAINTIFF,           X   IN THE CIRCUIT COURT OF  
VS:                                   X   BALDWIN COUNTY, ALABAMA  
CARLTON GRUBBS,                   X                   AT LAW  
                    DEFENDANT.       X           CASE NO. 8103  
TO THE HONORABLE ALICE J. DUCK, CLERK OF CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA:

WHEREAS, in the above entitled cause the Plaintiff recovered a judgment against the said Defendant, CARLTON GRUBBS, on the 11th day of December, 1968, for the sum of TWO THOUSAND FOUR HUNDRED FIVE & 75/100 DOLLARS (\$2,405.75), besides accrued interest and costs of said cause; and, whereas, execution was issued on said judgment against the said Defendant, on the 6th day of March, 1970, and thereafter, on the 6th day of March, 1970, the said execution was returned by the Sheriff of Baldwin County, Alabama, with the endorsement thereon "No Property Found," and said judgment remains unpaid and unsatisfied.

NOW, THEREFORE, this is to request you as Clerk of said Court to issue a notice to said Defendant requiring him to file in the Circuit Court of said County, within thirty days from the service of said notice, a statement in writing, under oath, of all the assets of the said accounts, and all other property, real, personal and 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 incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

The said CARLTON GRUBBS can be served at Route 1,  
Box 146, Robertsedale, Alabama 36567.

Dated this the 4 day of <sup>Nov</sup>~~April~~, 1970.

MONSANTO COMPANY

BY:

Forest A. Christian  
Attorney for Plaintiff

**FILED**

NOV 4 1970

**ALICE J. DUCK** CLERK  
REGISTER

233-25

SUMMONS

STATE OF ALABAMA, )

COUNTY OF BALDWIN. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons CARLTON GRUBBS, 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 MONSANTO AGRICULTURAL COMPANY.

Witness my hand this the 24 day of April, 1968.

Alice J. Duck  
Clerk

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COMPLAINT

MONSANTO AGRICULTURAL COMPANY,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	
	X	BALDWIN COUNTY, ALABAMA
VS:	X	
	X	AT LAW
CARLTON GRUBBS,	X	
	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant TWO THOUSAND THREE HUNDRED EIGHTY-FOUR & 76/100 DOLLARS, due from him by account on, to wit: the 1st day of February, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO THOUSAND THREE HUNDRED EIGHTY-FOUR & 76/100 DOLLARS, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of February, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO THOUSAND THREE HUNDRED EIGHTY-FOUR & 76/100 DOLLARS, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of February, 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 19th day of April, 1968.

ATTORNEY FOR THE PLAINTIFF

Forest A. Christian

Defendant's address:

Route 1, Box 146  
Robertsdale, Alabama 36567

FILED

APR 24 1968

ALICE J. DUCK CLERK  
REGISTER



AFFIDAVIT

STATE OF ALABAMA )

COUNTY OF BALDWIN )

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared

W. F. DEBOIS, known to me, who being duly sworn

upon his oath stated that he is the Financial Services Manager of officer

MONSANTO AGRICULTURAL COMPANY, organized and doing Company

business under the laws of the State of Missouri, that as

such he makes this affidavit, that he is familiar with the books

and business of MONSANTO, that the

attached account against CARLTON GRUBBS

is just and correct, within the knowledge of the affidavit, that

he has authority to make this affidavit and that he has personal

knowledge of the matters contained herein, that the items thereon

stated composing the said account, were sold and delivered to the

above mentioned debtor at the special instance and request of the

debtor and that credit has been duly given for all payments and

just and lawful offsets to which said debtor is entitled as thereon

stated, and that the balance thereof, amounting to the sum of

\$2,384.76 with interest from April 1, 1968, is justly due

and remains unpaid.

W F Debois  
Affiant

Sworn to, subscribed, acknowledged, signed and sealed before me

as a Notary Public under my seal of office, with my seal hereto

affixed on this the 19th day of April, 1968.

Affix Seal:

[Signature]  
Notary Public

My Commission Expires: \_\_\_\_\_

# STATEMENT

**Monsanto**  
C O M P A N Y

800 NORTH LINDBERGH BLVD.  
ST. LOUIS, MISSOURI 63166

LEDGER NO.		MO.	DAY	YEAR
326830	204	3	23	67

Mr. Carlton Grubbs  
Route #1  
Robertsdale, Alabama

**IMPORTANT:** IF PURCHASES AND PAYMENTS MADE NEAR THIS STATEMENT DATE ARE NOT REFLECTED, THEY WILL APPEAR ON THE NEXT MONTH'S STATEMENT. ANY DIFFERENCES SHOULD BE REPORTED PROMPTLY. ANY PAYMENTS ON THIS ACCOUNT SHOULD BE DIRECTED TO THE LOCK BOX SHOWN ON OUR INVOICES.

✓	DATE	REFERENCE	*TRANS-ACTION	DEBITS	CREDITS	BALANCE
	1 67	S/C		18 36		
	3 65	403731		346 00		
	3 65				300 00	
	3 65	402221		220 16		
	3 65	403121		949 50		
	4 65	403121		162 00		
	4 65	402391		236 50		
	4 65	402061		14 04		
	4 65	402931		14 84		
	6 65	414051		156 00		
	6 65	414031		156 00		
	6 65	414271		117 00		
	7 65	435211		82 00		
	7 65	435331		168 00		
	7 65	414561		126 00		
	2 67	S/C		18 36		
	3 68					
					100 00	2,484 76
						2,384 76
				234		

FORM 271 REV. 4-65

\* TRANSACTION CODE: 1 INVOICE - 2 DEBIT MEMO - 3 CREDIT MEMO - 4 CASH - 5 VOUCHER - 6 JOURNAL ENTRY - 7 BALANCE FORWARD

SUMMONS AND COMPLAINT

Received 25 day of April 1968  
and on 20 day of July 1968  
served a copy of the within 8 & C  
in Carlton Grubbs

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By H. F. Hall D. S.

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVICE OF 1 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$5.00

PROCESS(ES) OR A TOTAL OF \$6.00

MONSANTO AGRICULTURAL COMPANY,

PLAINTIFF,

VS:

CARLTON GRUBBS,

DEFENDANT.

FILED

APR 24 1968

ALICE J. DUCK

CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN

(205) 943-2201

P. O. DRAWER 190

FOLEY, ALABAMA 36535

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA 36535