

BELL INSURANCE AGENCY

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

ALGIN B. SANKS

X

AT LAW

NO. _____

Defendant

X

Comes defendant, Algin B. Sanks in the above styled cause and propounds the following interrogatories to the plaintiff, Bell Insurance Agency:

1. State your name?
2. Are you familiar with the accounts sued on in the above styled cause?
3. Examine account dated 8-10-66 and advise whether or not a mortgage clause was written into this insurance and the name of the mortgagee.
4. Examine account dated 7-17-67 ACP205073. Advise whether a mortgage clause was written into this policy and the name of the mortgagee.
5. Examine account dated 5-26-66. Advise the name of the insured as shown in this insurance policy.
6. Examine account dated 7-17-67. Advise whether or not your records disclose this 1961 Chevrolet was disposed of previously and the date of the disposal.
7. Examine accounts dated 10-7-68 and attach a copy of the policies issued.
8. Examine account dated 3-24-68 and attach a copy of the policy issued.


Attorney for defendants.

*Semi accepted
this 21st day of November, 1968*

*W. H. Hays
Atty for Plaintiff*

FILED

NOV 20 1968

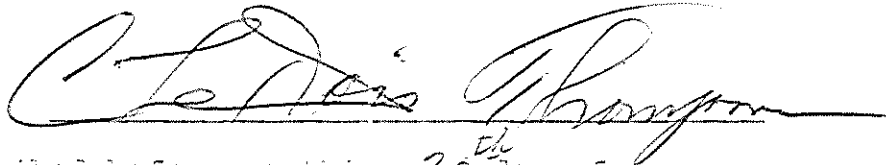
ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

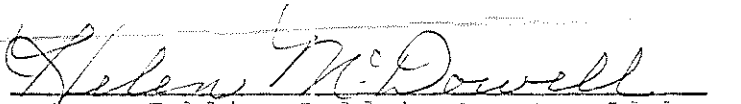
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am the attorney of record for the defendant in the above styled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendant on the trial of said cause.



Sworn to and subscribed before me this 20th day of November, 1968.



Notary Public, Baldwin County, Alabama

FILED

NOV 20 1968

ALICE J. DUCK

CLERK
REGISTER

| | | |
|-----------------------|---|-------------------------|
| BELL INSURANCE AGENCY |) | IN THE CIRCUIT COURT |
| |) | |
| PLAINTIFF |) | BALDWIN COUNTY, ALABAMA |
| |) | |
| VS |) | AT LAW |
| |) | |
| ALGIN B. SANKS |) | NUMBER: _____ |
| |) | |
| DEFENDANT |) | |

AMENDED COMPLAINT

Comes now Plaintiff in the above styled cause and amends the complaint to read as follows:

| | | |
|-----------------------|---|-------------------------|
| E. P. BELL d/b/a BELL |) | IN THE CIRCUIT COURT |
| INSURANCE AGENCY |) | |
| |) | BALDWIN COUNTY, ALABAMA |
| PLAINTIFF |) | |
| |) | AT LAW |
| VS |) | |
| |) | NUMBER: _____ |
| ALGIN B. SANKS |) | |
| |) | |
| DEFENDANT |) | |

Plaintiff claims of the Defendant the sum of FOUR-HUNDRED SEVENTY-SIX and SIXTY-TWO ONE-HUNDREDTHS (\$476.62) DOLLARS, due from him by account on the 24th day of March, 1968 which sum of money with interest thereon, is still unpaid.

W. H. Day
Attorney for Plaintiff

Plaintiff files by verified itemized statement of account which statement is attached hereto.

W. H. Day
Attorney for Plaintiff

Defendant may be found:

Rt. 2
Bay Minette, Alabama

FILED

DEC 6 1968

ALICE J. DUCK CLERK
REGISTER

STATEMENT

BELL INSURANCE AGENCY

- P. O. BOX 38 - PHONE 937-2751 - 109 W. FIRST STREET - BAY MINETTE, ALABAMA -

"INSURANCE" - "REAL ESTATE" - "MORTGAGE LOANS"

Mr. Algin B. Sanks
Route 2
Bay Minette, Alabama

\$ 476.62

PLEASE DETACH AND RETURN THIS PORTION OF STATEMENT WITH YOUR REMITTANCE

BALANCE FORWARD →

| | | | | | | |
|----------|---------------------------------------|---------------------|---------|-------|-------|--------|
| 3-24-65 | FAD 259340 | '63 Ford '60 Chev | INA | 112. | | |
| 4-10-65 | Credits to 5-25-65 | | | | 40. | |
| 5-29-65 | 20GF 821130 | '61 Chev | N. Y. | 52. | | |
| 6-21-65 | Credits to 2-15-66 | | | | 80. | |
| 3-24-66 | 20GF 857101 | '60 Chev & '63 Chev | N. Y. | 91. | | |
| 4-2-66 | Credits to 4-25-66 | | | | 20. | |
| 5-26-66 | 20GF 857115 | '61 Chev | | 38. | | |
| 6-18-66 | Credits to 9-28-66 | | | | 76. | |
| 8-10-66 | Dwn Pmt to Canal Ins. Co. '63 Ford | | | 56.05 | | |
| 11-7-66 | Credits to 1-28-67 | | | | 50. | |
| 3-24-67 | 20GF 857101 | '60 Chev '63 Chev | N. Y. | 137. | | |
| 7-17-67 | ACF 205073 | '66 Chev | S. Guar | 88. | | |
| 7-17-67 | ACF 205074 | '61 Chev | S. Guar | 22. | | |
| 8-18-67 | Dwn Pmt to Canal Ins. Co. '66 Chev | | | 59.50 | | |
| 10-7-68 | Monthly Pmt to Canal plus late charge | | | 17.64 | | |
| 10-7-68 | 733149 | '66 Chev Add'l Prem | Canal | 126. | | |
| 12-14-67 | Credit | | | | 15.64 | |
| 12-26-67 | 733149 | Return Premium | Canal | | 84.93 | |
| 3-24-68 | 20GF 857107 | '60 Chev '63 Chev | N. Y. | 185. | | |
| 6-28-68 | ACF 205073 | Cancellation | S. Guar | | 5. | |
| 6-28-68 | 20GF 857101 | Cancellation | N. Y. | | 136. | 476.62 |

STATEMENT

BELL INSURANCE AGENCY

- P. O. BOX 38 - PHONE 937-2751 - 109 W. FIRST STREET - BAY MINETTE, ALABAMA -

"INSURANCE" - "REAL ESTATE" - "MORTGAGE LOANS"

Page 2

• Mr. Algin B. Sanks
• Route 2
• Bay Minette, Alabama

\$ 476.62

PLEASE DETACH AND RETURN THIS PORTION OF STATEMENT WITH YOUR REMITTANCE

BALANCE FORWARD →

476.62

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS that before me, the undersigned authority, personally appeared E. P. Bell, d/b/a Bell Insurance Agency and, who being sworn, deposes and says;

I am E. P. Bell. I do business as Bell Insurance Agency. I am the owner of the above itemized statement of account with Algin B. Sanks and that the said itemized statement of account is true and correct and that the amount due thereon is just, due and correct after giving all credits and allowances.

BELL INSURANCE AGENCY

E. P. Bell
E. P. Bell

Signed and ascribed before me the 18th day of June, 1968.

Forthright B. Fitcher
Notary Public, State of Alabama

No. 8359

Bell Insurance
Agency

vs.

Alvin B Sanks

Amended Compt

FILED

DEC 6 1968

ALICE J. DUCK

CLERK
REGISTER

withaves

BELL INSURANCE AGENCY

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

~~ALGIN B. SANKS~~

X

AT LAW

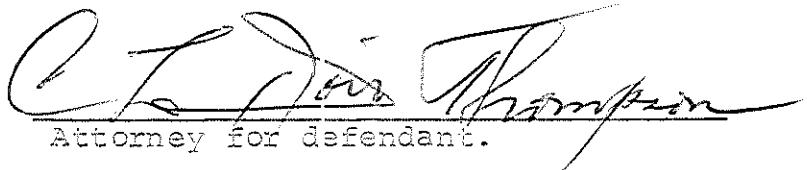
NO. _____

Defendant

X

Comes the defendant in the above styled cause and for answer to the complaint filed in said cause, shows unto this Honorable Court as follows:

1. He denies the allegations of said complaint.


Attorney for defendant.

I hereby certify that I have this 20 day of November, 1968, served a copy of the foregoing answer on Honorable Wilson Hayes, attorney for plaintiff, by depositing copy of same in the U. S. Mail, postage prepaid, properly addressed to his office in Bay Minette, Alabama.



FILED

NOV 20 1968

ALICE J. DUCK CLERK
REGISTER

BELL INSURANCE AGENCY

- P. O. BOX 38 - PHONE 937-2751 - 109 W. FIRST STREET - BAY MINETTE, ALABAMA -

"INSURANCE" - "REAL ESTATE" - "MORTGAGE LOANS"

Mr. Algin B. Sanks
Route 2
Bay Minette, Alabama

\$ 476.62

PLEASE DETACH AND RETURN THIS PORTION OF STATEMENT WITH YOUR REMITTANCE

| POSTING DATE | EFFECTIVE DATE | POLICY NUMBER | DESCRIPTION OF POLICY | COMPANY | CHARGES | CREDITS | BALANCE |
|-------------------|-------------------|---------------|---------------------------------------|---------|---------|---------|---------|
| BALANCE FORWARD → | | | | | | | |
| 3-24-65 | | FAD 259340 | '63 Ford '60 Chev | INA. | 112. | | |
| 4-10-65 | | | Credits to 5-25-65 | | | 40. | |
| 5-29-65 | | 20GF 821130 | '61 Chev | N. Y. | 52. | | |
| 6-21-65 | | | Credits to 2-15-66 | | | 80. | |
| 3-24-66 | | 20GF857101 | '60 Chev & '63 Chev | N. Y. | 91. | | |
| 4-2-66 | | | Credits to 4-25-66 | | | 20. | |
| 5-26-66 | | 20GF 857115 | '61 Chev | | 38. | | |
| 6-18-66 | | | Credits to 9-28-66 | | | 76. | |
| 8-10-66 | | | Dwn Pmt to Canal Ins. Co. '63 Ford | | 56.05 | | |
| 11-7-66 | | | Credits to 1-28-67 | | | 50. | |
| 3-24-67 | | 20GF857101 | '60 Chev '63 Chev | N. Y. | 137. | | |
| 7-17-67 | | ACF 205073 | '66 Chev | S. Guar | 88. | | |
| 7-17-67 | | ACF 205074 | '61 Chev | S. Guar | 22. | | |
| 8-18-67 | | | Dwn Pmt to Canal Ins. Co. '66 Chev | | 59.50 | | |
| 10-7-68 | | | Monthly Pmt to Canal plus late charge | | 17.64 | | |
| 10-7-68 | | 733149 | '66 Chev Add'l Prem | Canal | 126. | | |
| 12-16-67 | | | Credit | | | 15.64 | |
| 12-26-67 | | 733149 | Return Premium | Canal | | 84.93 | |
| 3-24-68 | | 20GF857107 | '60 Chev '63 Chev | N. Y. | 185. | | |
| 6-28-68 | | ACF 205073 | Cancellation | S. Guar | | 5. | |
| 6-28-68 | | 20GF857101 | Cancellation | N. Y. | | 136. | 476.62 |

BELL INSURANCE AGENCY
BAY MINETTE, ALABAMA

PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

BELL INSURANCE AGENCY

- P. O. BOX 38 - PHONE 937-2751 - 109 W. FIRST STREET - BAY MINETTE, ALABAMA -

"INSURANCE" - "REAL ESTATE" - "MORTGAGE LOANS"

Page 2

Mr. Algin B. Sanks
Route 2
Bay Minette, Alabama

\$ 476.62

PLEASE DETACH AND RETURN THIS PORTION OF STATEMENT WITH YOUR REMITTANCE

| POSTING DATE | EFFECTIVE DATE | POLICY NUMBER | DESCRIPTION OF POLICY | COMPANY | CHARGES | CREDITS | BALANCE |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------|-----------------------|---------|---------|---------|---------|
| BALANCE FORWARD → | | | | | | | 476.62 |
| STATE OF ALABAMA | | | | | | | |
| BALDWIN COUNTY | | | | | | | |
| <p>KNOW ALL MEN BY THESE PRESENTS that before me, the undersigned authority, personally appeared E. P. Bell, d/b/a Bell Insurance Agency and, who being sworn, deposes and says;</p> <p>I am E. P. Bell. I do business as Bell Insurance Agency. I am the owner of the above itemized statement of account with Algin B. Sanks and that the said itemized statement of account is true and correct and that the amount due thereon is just, due and correct after giving all credits and allowances.</p> <p style="text-align: center;">BELL INSURANCE AGENCY <i>E. P. Bell</i> E. P. Bell</p> | | | | | | | |
| Signed and ascribed before me the 18th day of June, 1968. | | | | | | | |
| <p style="text-align: center;"><i>Kathryn B. Fletcher</i> Notary Public, State of Alabama</p> | | | | | | | |

BELL INSURANCE AGENCY
BAY MINETTE, ALABAMA

PLEASE PAY
LAST AMOUNT
IN THIS COLUMN

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Algin B. Sanks to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Bell Insurance Agency.

Witness my hand, this the 5th day of ^{Oct}~~September~~, 1968.

Alice J. Duck
CLERK

| | | |
|-----------------------|---|-------------------------|
| BELL INSURANCE AGENCY |) | IN THE CIRCUIT COURT |
| |) | |
| PLAINTIFF |) | BALDWIN COUNTY, ALABAMA |
| |) | |
| VS |) | AT LAW |
| |) | |
| ALGIN B. SANKS |) | NUMBER: <u>8359</u> |
| |) | |
| DEFENDANT |) | |

---.---.---

Plaintiff claims of the Defendant the sum of FOUR-HUNDRED SEVENTY-SIX and SIXTY-TWO ONE-HUNDREDTHS (\$476.62) DOLLARS, due from him by account on the 24th day of March, 1968 which sum of money with interest thereon, is still unpaid.

W. L. Hay
Attorney for Plaintiff

Plaintiff files by verified itemized statement of account which statement is attached hereto.

W. L. Hay
Attorney for Plaintiff

Defendant may be found:

Rt. 2
Bay Minette, Alabama

FILED

OCT 8 1968

ALICE J. DUCK CLERK
REGISTER

Rt 2 Bm

NUMBER: 8359

BELL INSURANCE AGENCY

PLAINTIFF

VS

ALGIN B. SANKS

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 8 1968

ALICE J. DUCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Rt 2 Bayquette

Received 8-14 day of Oct 1968
and on 11 day of Oct 1968
I served a copy of the within etc
on Algin B. Sanks

By service on Alvin

TAYLOR WILKINS, Sheriff
By W. A. Talbert

10 miles north of Bk

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. A. Talbert
DEPUTY SHERIFF

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

October 9, 1970

Mrs. Alice J. Duck, Clerk
Circuit Court
Baldwin County
Bay Minette, Alabama 36507

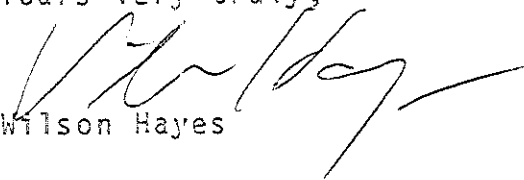
Re: Case #8359

Dear Mrs. Duck:

Enclosed is a Motion for Writ of Discovery in
the above referenced case.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

BELL INSURANCE AGENCY, I IN THE CIRCUIT COURT OF
 Plaintiff, I BALDWIN COUNTY, ALABAMA
 Vs. I AT LAW
ALGIN B. SANKS, I
 Defendant. I NUMBER: 8359

MOTION FOR WRIT OF DISCOVERY

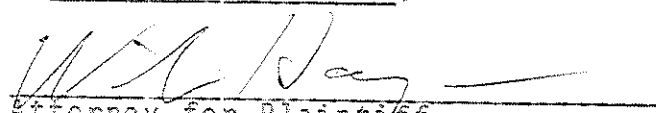
TO THE HONORABLE ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Whereas, in the above styled cause the Plaintiff recovered a judgment against the said Defendant, Algin B. Sanks on the 14th day of May, 1969, for the sum of \$470.00 besides the cost of said cause; whereas execution was issued on the said judgment against the said Algin B. Sanks, and thereafter the said execution was returned by the Sheriff of Baldwin County, Alabama with the endorsement thereon "No Property Found" and the said judgment remains unpaid and unsatisfied.

NOW THEREFORE, this is to request you as Clerk of said Court to issue a notice to the said Algin B. Sanks requiring him 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 Algin B. Sanks including money, choses 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 Algin B. Sanks resides at Bay Minette
in the County of Baldwin, State of Alabama.

Dated this 9th day of October, 1970.



Attorney for Plaintiff
Wilson Hayes

20,
WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

November 9, 1970

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

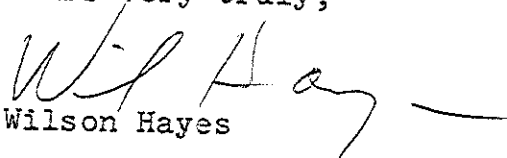
Re: Bell Insurance Agency Vs.
Algin B. Sanks, Case #8359

Dear Mrs. Duck:

Please file the enclosed Motion and submit it
to the Judge for signature.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms
Enc.

BELL INSURANCE AGENCY,

Plaintiff,

Vs.

ALGIN B. SANKS,

Defendant.

§

§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


NUMBER: 8359

MOTION FOR ORAL EXAMINATION OF DEBTOR

Comes now Wilson Hayes, Attorney of record for the Judgment Creditor in the above styled cause and files herein this, his affidavit, stating that a Writ of Discovery was issued out of this Court in this cause and that Defendant did file herein his statement according to the Writ and that the said statement by the Judgment Debtor, namely Algin B. Sanks, does not contain a full, true and correct statement and description of his assets as required by the law made and provided, Title 7, Section 903 et seq, Alabama Code 1940 as amended and

Plaintiff does hereby move the Court to make and enter an Order requiring the said Judgment Debtor, Algin B. Sanks, to be and appear before this Court on a day to be set by the Court, then and there to submit to oral examination, under oath, touching the nature, location, description and value of such assets and all his assets, and that notice of such setting be served on the said Algin B. Sanks.


Respectfully submitted.



Attorney of Record
Wilson Hayes

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Mary C. Stiers, this day personally appeared Wilson Hayes, who is known to me and who being by me first duly sworn to speak the truth, deposes and says he has read the foregoing instrument and knows the facts therein stated are true to the best of his knowledge, information and belief.




Wilson Hayes

Sworn to and subscribed before me this the 9th day of November, 1970.

FILED

NOV 10 1970

ALICE J. DUCK CLERK
REGISTER



Mary C. Stiers, Notary Public
Commission expires: 1-9-74

479 2

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BELL INSURANCE AGENCY, § IN THE CIRCUIT COURT OF
Plaintiff, § BALDWIN COUNTY, ALABAMA
Vs. § AT LAW
ALGIN B. SANKS, §
Defendant. § NUMBER: 8359

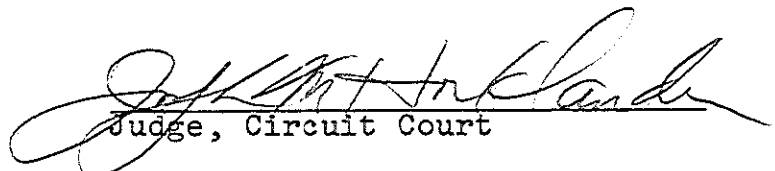
ORDER FOR ORAL EXAMINATION OF DEBTOR

In this cause came Plaintiff by his Attorney, Wilson Hayes, and filed herein Affidavit, duly verified, stating that the statement of Defendant, the said Judgment Debtor, Algin B. Sanks, did not contain a full, true and correct statement and description of his assets as required by Title 7, Section 903 et seq, Code of Alabama 1940, as amended, and praying the Court to require the Defendant, Judgment Debtor, Algin B. Sanks, to be and appear before this Court at a time and place to be set by this Court and to then and there be examined, under oath, touching the nature, location, description and value of his assets, it is therefore

ORDERED, ADJUDGED and DECREED that Algin B. Sanks, be and appear before this Court at 1 o'clock, P.M. on the 7 day of December, 1970, then and there to submit to oral examination, under oath, touching the nature, location, description and value of his assets and to that end produce all such papers, documents or books which may contain material evidence of such assets.

It is further ORDERED that a copy of this notice be served forthwith on the said Algin B. Sanks.

Done this 16 day of November, 1970.


Judge, Circuit Court

FILED

NOV 16 1970

ALICE J. DUCK CLERK
REGISTER

479 7

8359

Bell Insurance
Agency

vs.

Algin B. Hanks

Motion & Order

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Deputy DEPUTY SHERIFF

Received 16 day 23 Nov. 1917
and on 30 day of Nov 1917
I served a copy of the within Motion & Order
on Algin B. Hanks
By service on _____

TAYLOR WILKINS, Sheriff
By Al B. Zellerbach
10 miles north
of B H

| | | |
|------------------------|---|-------------------------|
| BELL INSURANCE AGENCY, | X | IN THE CIRCUIT COURT OF |
| Plaintiff, | X | BALDWIN COUNTY, ALABAMA |
| -vs- | X | AT LAW |
| ALGIN B. SANKS, | X | CASE NO. 8359 |
| Defendant. | X | |

Comes Algin B. Sanks in answer to the Writ of Discovery filed in the above styled cause to the Plaintiff.

- (1) Your said Defendant has less than \$50.00 in money.
- (2) Your said Defendant has no choses from which he can benefit.
- (3) Your said Defendant has no notes, bonds, or accounts payable to him.
- (4) Your said Defendant has no real property other than a home subject to mortgage.
- (5) Your said Defendant has no personal property other than mechanics tools of the value of \$50.00.
- (6) Your said Defendant has no property identified as mixed or interest therein.

The said Defendant owes the following debts:

- | | |
|-------------------------------------------|-----------|
| (1) Baldwin County Bank----- | \$800.00 |
| Bay Minette, Alabama | |
| (2) First National Bank----- | \$800.00 |
| Atmore, Alabama | |
| (3) Dr. George Halliday----- | \$220.00 |
| Bay Minette, Alabama | |
| (4) Doctor bills through Merchants | |
| Adjustment Service, Mobile, Ala.----- | \$ 95.00 |
| (5) Doctor bills through Mobile | |
| Adjustment Service, Mobile, Ala.----- | \$257.00 |
| (6) Mutual Industrial Finance Corporation | |
| Mobile, Alabama----- | \$560.00 |
| (7) Interstate Securities Company | |
| of Alabama----- | \$1880.00 |

Respectfully submitted,

Algin B. Sanks
Defendant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, C. LeNoir Thompspon, a Notary Public, in and for said County, in said State, personally appeared Algin B. Sanks, who, being by me first duly sworn, says on oath that the facts set forth in the foregoing answer are true and correct.

Algin B. Sanks
ALGIN B. SANKS

Sworn to and subscribed before me, this 30 day of

Oct, 1970.

C. LeNoir Thompspon
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

FILED

OCT 30 1970

ALICE J. DICK CLERK
REGISTER

479 D

4

BELL INSURANCE AGENCY, I IN THE CIRCUIT COURT OF
 I BALDWIN COUNTY, ALABAMA
 I AT LAW
Vs. I
ALGIN B. SANKS, I
 I NUMBER: 8359
Defendant. I

MOTION FOR WRIT OF DISCOVERY

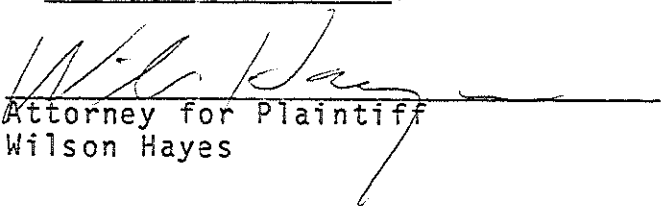
TO THE HONORABLE ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Whereas, in the above styled cause the Plaintiff recovered
a judgment against the said Defendant, Algin B. Sanks on the 14th
day of May, 1969, for the sum of \$470.00 besides the cost of
said cause; whereas execution was issued on the said judgment
against the said Algin B. Sanks, and thereafter the said execution
was returned by the Sheriff of Baldwin County, Alabama with
the endorsement thereon "No Property Found" and the said judgment
remains unpaid and unsatisfied.

NOW THEREFORE, this is to request you as Clerk of
said Court to issue a notice to the said Algin B. Sanks requiring
him 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 Algin B. Sanks
including money, choses 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 Algin B. Sanks resides at Bay Minette
in the County of Baldwin, State of Alabama.

Dated this 9th day of October, 1970.



Attorney for Plaintiff
Wilson Hayes

FILED

OCT 9 1970

Vol 61- Pg 4 79A

ALICE J. DUCK CLERK
REGISTER

BELL INSURANCE AGENCY,

Plaintiff,

Vs.

ALGIN B. SANKS,

Defendant.

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§

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§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 8359

WRIT OF DISCOVERY

TO: ALGIN B. SANKS

Take notice, that, whereas the Plaintiff in the above entitled cause has requested in writing, the undersigned, as Clerk of said Court to issue notice to you as Defendant 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 28, 1915, "to provide for the discovery of assets of judgment debtors, and to facilitate the enforcement or collection of judgments in courts of law and equity in this State," and has filed said request, in writing, in this cause endorsed "no property found" by the Sheriff of Baldwin County, and that you reside in the State of Alabama.

Now therefore, you, the said Algin B. Sanks 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 interests 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 lends, mortgages or encumbrances thereon.

Witness my hand this 9 day of Oct., 1970.

Alvin J. Duck
Clerk

TO ANY SHERIFF IN THE STATE OF ALABAMA: Greetings.

You are hereby commanded to serve the foregoing notice upon the above named Algin B. Sanks and make due return of your said service and of this notice.

Alvin J. Duck
Clerk

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10-12-70

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8359

Bell Insurance Agency

vs.
Algim B. Hank
20 mi.

Wait

Received 10 day of Oct 19 70
and on 12 day of Oct 19 70
I served a copy of the within Wait of Disc
on Algim B. Hank

By service on

TAYLOR WILKINS, Sheriff
Will Taylor S. S.

Sheriff claims 0 miles in
Ten Cents per mile Total \$ 0.00
TAYLOR WILKINS, Sheriff
BY Gilbert
DEPUTY SHERIFF