

SUMMONS AND COMPLAINT

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
CASE NO. _____
_____ TERM, 1968

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Charles Pukys, Robertsdale, Alabama, 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, by H. Kennedy, Plaintiff, against Charles Pukys, Defendant.

WITNESS my hand this 20 day of November, 1968.

Alice J. Clark, CLERK.

H. KENNEDY,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
Vs.	X	AT LAW
CHARLES PUKYS,	X	CASE NO. <u>8443</u>
Defendant:	X	

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Seventy-Eight and 34/100 (\$178.34) Dollars, due from him by account on the 30th day of March, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant One Hundred Seventy-Eight and 34/100 (\$178.34) Dollars, on account stated between the Plaintiff and the Defendant on the 30th day of March, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant One Hundred Seventy-Eight and 34/100 (\$178.34) Dollars, for merchandise, goods and chattels sold by Plaintiff to Defendant on the 30th day of March, 1968, which sum of money, with interest thereon, is still unpaid.

Kenneth Cooper
ATTORNEY FOR PLAINTIFF

Defendant's Address:
Robertsdale, Alabama

CASE NO. 8443

DEFENDANT'S ADDRESS:

Robertsdale, Alabama

H. KENNEDY,

PLAINTIFF,

VS.

CHARLES PUKYS,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

ATTORNEY FOR PLAINTIFF:

KENNETH COOPER

Received 21 day of Nov. 1968

and on 9 day of Dec. 1968

I served a copy of the within on

Charles Pukys

By service on

TAYLOR WILKINS, Sheriff

D. S.

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Charles Pukys
DEPUTY SHERIFF

H. KENNEDY	Ø	IN THE CIRCUIT COURT OF
Plaintiff	Ø	BALDWIN COUNTY, ALABAMA
-VS-	Ø	CIVIL ACTION
CHARLES PUKYS	Ø	CASE NO. 8443

REQUEST FOR DISCOVERY OF ASSETS

TO EUNICE B. BLACKMON, CLERK OF SAID COURT:

The Plaintiff herein having recovered on the fifteenth day of May, 1969, a judgment against the defendant in the above-styled cause for the sum of One Hundred Ninety-One and No/100 (\$191.00) 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 the Court will issue a notice to the said Charles Pukys requiring him to file in this Honorable Court within thirty days from the service of such notice a statement in writing under oath of all the assets of the said Charles Pukys, 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 a reasonable value of each item thereof, together with a detailed 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.

The said Charles Pukys resides in Robertsedale, Alabama.

Dated this 15th day of August, 1974.

FILED

AUG 14 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

Kenneth Coates
ATTORNEY FOR PLAINTIFF
Post Office Box 1000
Bay Minette, Alabama 36507

H. KENNEDY

Plaintiff's

VS:

CASE NO. 8443

CHARLES PUKYS

Defendants

WRIT OF DISCOVERY

TO Charles Pukys

TAKE NOTICE, THAT, WHEREAS THE PLAINTIF 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 JUDGEMENT 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 JUDGEMENT DEBTORS, AND TO FACILITATE THE ENFORCEMENT OR COLLECTION OF JUDGEMENTS 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 Charles Pukys 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 16th DAY OF August,
19 74.

Levin B. Blackman
CLERK

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON THE ABOVE NAMED Charles Pukys AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Levin B. Blackman
CLERK

H. KENNEDY

Plaintiffs

VS:

CASE NO. 8443

CHARLES PUKYS

Defendants

WRIT OF DISCOVERY

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WITNESS MY HAND THIS 16th DAY OF August, 19 74.

Lynnie B. Blackmon
CLERK

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

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Lynnie B. Blackmon
CLERK

Brown

8/22/74

RECEIVED

AUG 16 1974

TAYLOR WILKINS
SHERIFF

Deceased

#8443

H. Kennedy

vs:

Charles Pukys
Robertsdale, Alabama

Writ of Discovery

FILED

AUG 14 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

Kenneth Cooper,
Attorneys for Plaintiff

Received 16 day of Aug 19 74
and on _____ day of _____ 19 ____
I served a copy of the within _____
on Charles Pukys
By service on _____
TAYLOR WILKINS, Sheriff
By _____
D. S.

Sheriff's Office
Tom Conis per mile Total \$ _____
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

Handwritten notes:
Kenneth Cooper
Attorney for Plaintiff
Charles Pukys
Robertsdale, Alabama