

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

August 12, 1969

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

Re: Max M. Foreman, D.V.M.;  
indiv. & d/b/a The  
Stockman, Robertsedale, Ala.  
Vs: William Campbell, a/k/a  
Bill Campbell  
Case No. 8791 or 8792

Dear Judge Mashburn:

Kindly render a default judgment in this case  
based on ans sworn to itemized statment of account in  
principal amount of \$411.07 plus \$50.00 interest,  
for a total of \$461.07.

Cordially yours,



FOREST A. CHRISTIAN

FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
P. O. DRAWER 190  
AREA CODE 205 - PHONE 943-2201  
FOLEY, ALABAMA 36535

8791

July 22, 1970

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

Re: Max Foreman, D.V.M., Ind.  
& d/b/a The Stockman  
Vs: William Campbell, a/k/a  
Bill Campbell, Case No. 8791  
Re: Max Foreman, D.V.M., Ind.  
& d/b/a Baldwin Animal Clinic  
Vs: William Campbell, a/k/a  
Bill Campbell, Case No. 8792

Dear Judge Mashburn:

We have judgments in the above cases which are one or two years old and I do not know why they are on this docket.

The Defendant has made no payments on either judgments and since I do not know for what purpose they are on docket, take them off the docket or write such order which would best protect my client because the judgments in these cases amount to over \$6,000.

We believe they may be on the calendar because we filed for Discovery of Assets and we have not had an answer and more than sufficient time has past for this. If proper we wish you to issue proper order for them to answer our request for list of assets under oath.

Cordially yours,

  
FOREST A. CHRISTIAN

NOTE TO CLERK: Please attach to docket sheet.

DISCOVERY OF ASSETS OF JUDGMENT DEBTOR

MAX M. FOREMAN, D.V.M., Ind. & d/b/a THE STOCKMAN,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:		AT LAW
WILLIAM CAMPBELL, a/k/a BILL	X	CASE NO. 8791
CAMPBELL,	X	
<del>CLERK</del>		
DEFENDANT.	X	

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 Defendant, WILLIAM CAMPBELL, a/k/a BILL CAMPBELL, on the 13th day of August, 1969, for the sum of FOUR HUNDRED SIXTY-ONE & 07/100 DOLLARS (\$461.07), besides accrued interest and costs of said cause; and, whereas, execution was issued on said judgment against the said Defendant, on the 10th day of January, 1970, and thereafter, on the 10th day of January, 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 Defendant including money, choses in act, bonds and 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 WILLIAM CAMPBELL, a/k/a BILL CAMPBELL  
can be served at Robertsdale, Alabama.

Dated this the 2 day of February, 1970.

MAX M. FOREMAN, D.V.M., Ind.  
& d/b/a BALDWIN ANIMAL CLINIC

BY:

  
Forest A. Christian, Attorney  
for the Plaintiff

FILED

FEB 3 1970

ALICE J. BUCK CLERK  
REGISTER

DISCOVERY NOTICE FOR ASSETS OF JUDGMENT DEBTOR

MAX M. FOREMAN, D.V.M., Ind. & d/b/a THE STOCKMAN,	X	IN THE CIRCUIT COURT OF
	X	
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
	X	
VS:	X	AT LAW
	X	
WILLIAM CAMPBELL, a/k/a BILL CAMPBELL,	X	CASE NO. 8791
	X	
DEFENDANT.	X	

TO: WILLIAM CAMPBELL, a/k/a BILL CAMPBELL, Robertsdale, Alabama.

Take notice, That, Whereas, the MAX M. FOREMAN, D.V.M., Ind. & d/b/a BALDWIN ANIMAL CLINIC, 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 that an execution was returned on the judgment in this cause on the 10th day of January, 1970, endorsed "No Property Found," by the Sheriff of Baldwin County, Alabama, and that you reside in the State of Alabama.

NOW, THEREFORE, you, the said Judgment Debtor, WILLIAM CAMPBELL, a/k/a BILL CAMPBELL, 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 and bonds and accounts, and all other property, real, personal or mixed,

Discovery Notice for Assets of Judgment Debtor-Page Two

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 incumbrances thereon.

Witness my hand this the 3 day of February, 1970.

Alice J. Duck  
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, WILLIAM CAMPBELL, a/k/a BILL CAMPBELL, Robertsedale, Alabama, and make due return of your said service and of this notice.

Alice J. Duck  
Alice J. Duck, Clerk

Received 13 day of January 1970  
and on 14 day of Feb 1970

I served a copy of the within DEC  
on William Campbell

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

TAYLOR WILKINS, SHERIFF  
By H. Brown

50 miles 17.5

May 17. Jensen  
D.D. in  
Baldwin Clinic  
US.

William Campbell

Sheriff claims  
Ten Cents per mile Total \$ 5.00  
By TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

FILED

FEB 6 1970

ALICE J. BARK  
CLERK  
REGISTER

422

MO. 8791

SUMMONS

STATE OF ALABAMA, )

COUNTY OF BALDWIN. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons WILLIAM CAMPBELL, a/k/a BILL CAMPBELL, 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 MAX M. FOREMAN, D.V.M., individually and doing business as THE STOCKMAN, Robertsdale, Alabama.

Witness my hand this the 40 day of July, 1969.

Alice J. Duck  
Clerk

\*\* \*\* \*

MAX M. FOREMAN, D.V.M.,  
individually & d/b/a  
THE STOCKMAN, Robertsdale,  
Alabama,

PLAINTIFF,

VS:

WILLIAM CAMPBELL, a/k/a  
BILL CAMPBELL,

DEFENDANT.

X  
X  
X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

no. 8791

COUNT I:

The Plaintiff claims of the Defendant FOUR HUNDRED ELEVEN & 07/100 DOLLARS (\$411.07), due from him by account on, to wit: the 10th day of June, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant FOUR HUNDRED ELEVEN & 07/100 DOLLARS (\$411.07), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 10th day of June, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant FOUR HUNDRED ELEVEN & 07/100 DOLLARS (\$411.07), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 10th day of June, 1969, 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 9th day of July, 1969.

ATTORNEY FOR THE PLAINTIFF

Forest A. Christian

Defendant's address:

Robertsdale, Alabama 36567

JUL 10 1969



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 MAX FOREMAN, D. V. M., known to me, who being duly sworn upon his oath stated that he is the Owner of THE STOCKMAN Company, organized and doing business under the laws of the State of Alabama, that as such he makes this affidavit, that he is familiar with the books and business of THE STOCKMAN, that the attached account against WILLIAM CAMPBELL, a/k/a BILL CAMPBELL 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 \$411.07 with interest from June 10, 1967, is justly due and remains unpaid.

Max Foreman  
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 9th day of July, 1969.



Ruth Hellingworth  
Notary Public

My Commission Expires March 2, 1970  
Ruth Hellingworth  
Notary Public  
Baldwin County, Alabama  
My Commission Expires March 2, 1970

Sheet No. 1

Account No. \_\_\_\_\_

Terms \_\_\_\_\_

NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

Rating \_\_\_\_\_

Credit Limit \_\_\_\_\_



18-153

"EYE-EASE" HAMMILL LEDGER

D. 65  
19

ITEMS

FOLIO

✓

DEBITS

CREDITS

BALANCE

Nov 2 12599

3 12406

Nov 5 12616

6 12628

Nov 20 12762

22 12770

22 12784

23 12790

27 12822

Dec 3 12875

Dec 10 12941

20 13034

27 13091

28 13126

31 13135

606 Jan 5 13186

7 13188

15 13270

18 13305

26 13375

Feb 5 13449

9 13495

396

374

260

240

640

126

285

395

260

374

260

260

260

624

312

374

260

260

260

1009

520

520

8051

8420

8685

8945

9585

9771

10024

10421

10681

11055

11315

11575

11835

12459

12721

13145

13405

13665

13905

14934

15459

15974

Account No. \_\_\_\_\_

Sheet No. 2

NAME

Terms

ADDRESS

Rating

Credit Limit

*Bill Campbell*

DATE	ITEMS	FOLIO	✓	DEBITS	CREDITS	BALANCE
1966						159 77
Feb 21	136 01			1 15		160 89
Mar 9	137 62			3 90		164 79
Apr 1	139 91			17 16		181 95
May 3	142 55			32 67		214 57
7	142 85			3 16		212 73
May 15	143 55			1 30		214 03
31	144 75			21 84		235 87
June 24	146 58			3 12		238 99
29	147 05			2 60		241 59
July 5	147 33			1 04		242 63
5	147 36			16 21		258 84
5	71 59			5 20		264 04
July 23	149 05			18 68		282 72
Aug 5	675 15			12 50		295 22
Aug 17	676 76			13 36		308 58
29	677 82			20 65		329 23
Sept 9	679 01			27 49		356 72
14	679 61			61 88		418 60
19	679 85				400 00	18 60
27	150 82			1 04 00		122 60
Oct 5	151 61			32 41		155 01
1st Nov 8	166 37			52 63		207 64

Sheet No. 3

Account No. \_\_\_\_\_

Terms \_\_\_\_\_

NAME

*Campbell, Bill*

Rating \_\_\_\_\_

ADDRESS

Credit Limit \_\_\_\_\_

18-153  
"EYE-EASE" HAMMILL LEDGERDate  
19 67

ITEMS

FOLIO

✓

DEBITS

CREDITS

BALANCE 64  
267

Mich 14 16696

Apr 21 17029

May 29 17384

July 29 72871

Aug 15 17559

Aug 28 17674

Sept 4 17753

Oct 9 18066

Nov 3 18329

Dec 4 18599

1968  
Jan 2 19258

19 19457

Apr 3 19919

May 6 191

" 27 424

June 10 596

931

1021

2439

1311

676

780

780

780

2361

806

910

1768

2226

325

2553

676

21695

22716

25156

26466

27142

27922

28702

29482

31843

32649

33559

35327

37553

39878

40431

41107

Received 10 day of July 1969  
and on 12 day of July 1969  
I served a copy of the within cc  
on William Campbell

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

TAYLOR WILKINS Sheriff

By H. Brown  
59 m. R. T.  
R-Lala

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY Brown  
DEPUTY SHERIFF

770.8791

SUMMONS AND COMPLAINT

MAX M. FOREMAN, D.V.M., indiv. &  
d/b/a The Stockman, Robertsdale,  
Alabama,

PLAINTIFF,

VS:

WILLIAM CAMPBELL, a/k/a BILL  
CAMPBELL,

DEFENDANT.

FILED

JUL 20 1969

ALICE J. DUCK CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN  
(205) 943-2201  
P. O. DRAWER 190  
FOLEY, ALABAMA 36535