IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

No. 1531

Local Trademarks, Inc.,

Plaintiff.

ve.

Roy Beesley, Individually, and trading as Beesley Plumbing Company.

Defendant.

Under authority of Title 7, Section 904, of the Code of Alabama of 1940, the judgment against the above-named defendant now remaining unsatisfied, the plaintiff files the following affidavit and prays that this Honorable Court shall make an order requiring judgment debtor to appear before this Court on a day to be set by the Court and to submit to an oral examination under oath touching the nature, location, description and value of the assets of said judgment debtor and prays that judgment debtor be required to produce any and all papers, documents or books which may contain material evidence of such assets.

A. S. Whiting, Attorney for Plaintiff

STATE OF ALABAMA MOBILE COUNTY

Personally appeared before me, the undersigned authority in and for said County and State, A. S. Whiting, who being duly sworn says on oath that he is the attorney of record for Local Trademarks, Inc., plaintiff in the above-styled cause, and further states that to the best of affiant's knowledge, information and belief the foregoing statement does not contain a full, true and correct statement and description of such assets as required herein.

Subscribed and sworn to before me this 13th day of July, A. D. 1951.

Resalie 70 Schermer Notary Public, Mobile County, Alabama.

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S. E. W.

Roy Beerloy, Indiatonally, and Angiligies deside Placeany Congress

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Finder emthering of Misla 2, Contion 90%, of the Octo of Alebera of 1990, the judgment agained the chore-wheel defeating now remaining answeriding the grant state the following affidents one properties that the this Education, the plants that makes an order requiring judgment decreased to be appear before this Court on a lay to be not by the Court and to public to an order entired and court on the problem of the continuities of the continuity of the continuities and court and continuities and continuities and continuities of the continuitie

SEASE OF ALABAMA. MOBILE CONTI

in and for roll county and desire, A. S. Anting, the being doly even eages on each that he is the atterney of record for head. Productive, inc., plaintiff in the above-egyled cense, and further obvious that to be been of editional's browledge, information and belief the foregoing statement does not contain a full, true and certain and description of such assets as required mercia.

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Robert Publice, Nobile County, Alabasa.

AT LAW.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

No. 1531.

Local Trademarks, Inc.,

Plaintiff.

VS.

Roy Beesley, Individually and trading as Beesley Plumbing Company,

Defendant.

This day came A. S. Whiting, attorney of record for Local Trademarks, Inc., the plaintiff in the above-styled cause, and filed his affidavit that to the best of affiant's knowledge, information and belief the statement of assets heretofore filed by Roy Beesley, the above-named defendant and judgment debtor, is not a full, true and correct statement and description of his assets and the said judgment in this cause remaining unsatisfied, and now upon consideration of the same, it is

Considered, ordered and adjudged that the said Roy Beesley be and	
appear before the Court in his own proper person ato'clock	VĮ.
on the asy of, 1951, to submit to an oral	
examination under oath touching the nature, location, description and	
value of such assets; and that the said Roy Beesley do, at the time and	
place hereinabove named, produce and bring with him all papers, document	S
or books which may contain material evidence of his assets.	

Let a copy of this order be served forthwith upon the said Roy Beesley.

Dated this ____dev of July, A. D. 1951.

Circuit Judge.

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

12 July 1951

Mrs. Alice J. Duck Clerk of Court Bay Minette, Ala.

Dear Mrs. Duck:-

Enclosed herewith is an affidavit of Roy Beesley, a copy of which has been mailed to A. S. Whiting in Mobile.

Yours very truly,

C. G. Chason

CGC:lu

Encl:

cc: A. S. Whiting, Attorney
Annex, First National Bank Bldg.
Mobile, Alabama

LOCAL TRADEMARKS, INC.,)		
PLAINTIPP,)	IN THE CIRCUIT COURT OF	
	>	COUNTY, ALABAMA. AT LA	and a
ROY BEESLEY, Individually and trading as EMESLEY PLEASURE)	CASE WO. 1531 .	
COMPANT,)		
DEFERDANT.)		en e

Now comes the plaintiff in the above styled cause and shows that on, to-wit, May 17, 1951, 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 1960, Tit. 7, Section 903; That said notice was duly and personally served on the said defendant on to-wit May 26, 1951; that the said defendant has will-fully refused to file such statement.

The premises considered, the plaintiff petitions the Court that the said Roy Beesley 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 Plaintyff.

STATE OF ALABAMA

MOBILE COUNTY

A. S. Whiting, being first duly sworn, saith that he is attorney of record for the plaintiff in this cause and, with due authority makes this affidavit for and its behalf; that the matters and things set out in the foregoing petition are true to the peace affiant's information and belief.

Subscribed and sworn to before me this ______ day of June A. D., 1951.

Ema Rome Whiting
BOLARY REPUBLIC
Mobile, County, Alabama.

LOCAL TRADEMARKS, INC.,)	IN THE CIRCUIT COURT OF BALDWIN
PLAINTIFF,)	COUNTY, ALABAMA. AT LAW.
-VS-)	
ROY BEESLEY, Individually)	CASE NO. 1531 .
and trading as BEESLEY PLUMBING COMPANY,)	•
DEFENDANT.)	Com.

Upon consideration of the petition filed herein by the above named defendant on the 29^{th} day of June, 1951, praying that the said defendant be cited as for a contempt, it is,

Ordered, adjudged and decreed by the Court that the said Roy
Beesley do be and appear before the Court on the 12th day of Ally,
1951 at 10:00 1, 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.

Dated this the 30th day of Aure, 1951.

Circuit Judge. Malleberry Je

20 Local Tradeores In and copy of said gentran and Charles on Carlo 2 Davis ed series be alid

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April 19 July 19 July

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ALMUR S. WHITING ATTORNEY AND COUNSELOR AT LAW SUITE 602 ANNEX FIRST NATIONAL BANK BUILDING MOBILE 6, ALABAMA

TELEPHONES: OFFICE: 2-3604 RESIDENCE: 6-6226

July 13th, 1951.

P. O. BOX 988

Hon. Alice J. Duck, Clerk of Circuit Court, Bay Minette, Alabama.

Dear Mrs. Duck:

Re: Case 1531.
Local Trademarks, Inc. vs. Roy Beesley.

Enclosed herewith please find, in duplicate, Motion and Affidavit, and Order for the oral examination of the above-named judgment debtor, which please accord your usual prompt and efficient attention.

· With kind personal regards, I remain.

Yours very truly,

enc.

747

ALMUR S. WHITING ATTORNEY AND COUNSELOR AT LAW SUITE 602 ANNEX FIRST NATIONAL BANK BUILDING MOBILE 6, ALABAMA

TELEPHONES: OFFICE: 2-3604 RESIDENCE: 6-6226 May 16, 1951.

P. O. BOX 988

Hon. Alice J. Duck, Circuit Clerk, Bay Minette, Ala.

Dear Mrs. Duck:

Re: Case No. 1531. Local Trademarks, Inc. Vs. Roy Beesley.

The Sheriff having returned execution in the above case "no property found", request is hereby made for writ of discovery. Code 1940, Title 7, Sec. 903 provides that upon the written request of the judgment creditor, filed with the Clerk of Register, the officers shall execute a notice to the judgment debtor against whom execution has been returned "no property found", requiring such judgment debtor to file in Court, within thirty days from the service of the notice, a statement in writing of his assets.

I have prepared and enclose herewith suggested form of notice to be sent to Mr. Beesley by yourself as Clerk, kindly give this madder your usual courteous and prompt attention, and oblige,

Yours truly,

ASW/e

FILED
MAY 16 1951
AUGE A DUCK, Clerk

LOCAL TRADEMARKS, INC.,)	IN THE CIRCUIT COURT OF BALDWIN
PIAINTIFF,)	COUNTY, ALABAMA. AT LAW.
VS)	
ROY BEESLEY, Individually and trading as BEESLEY PLUMBING)	CASE NO. 1531 -
COMPANY,)	
THERENIANE)	

TO ROY BEESLEY, DEFENDANT, FOLEY, ALABAMA:

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 a statement, in writing, under oath, of all your assets, as provided in Code 1940, Title 7, Section 903, 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 16 day of May, 1951, endorsed "no property found", by the Sheriff of Baldwin County, and that you reside in the State of Alabama.

NOW THEREFORE, you are hereby required, within thirty days from the service hereof, to file in this Court, a statement, in writing under oath, of all of 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, encumbrances or mortgages.

WITNESS my hand this // day of May, 1951.

CLERK OF CIRCULT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA -GREETING:

You are hereby commanded to serve the foregoing notice upon Roy Beesley, Defendant, and make due return of your said service and of this notice within thirty days from date, how you have executed the

same.

Witness my hand this // day of May, 1951.

CLERK OF THE CHOUIT COURT

Heceived in Sherill's Office this / de sa // // // // // TAYLOR // // // // TAYLOR

by serving copy of within Summons and Complaint on

Roy Beerley

. OF May

ALMUR S. WHITING
ATTORNEY AND COUNSELOR AT LAW
SUITE 602 ANNEX FIRST NATIONAL BANK BUILDING
MOBILE 6. ALABAMA

*ELEPHONES:
OFFICE: 2-3604
RESIDENCE: 6-6226

Mrs. Alice Duck Circuit Clerk Bay Minette, Alabama

Dear Madam:

RE: Local Trademarks, Inc. vs. Roy Beesley. Our File #1541

Please find enclosed, original and copy of complaint in the above styled cause, which I would thank you to process for service upon the defendant as soon as may be.

Respectfully yours.

W/pb

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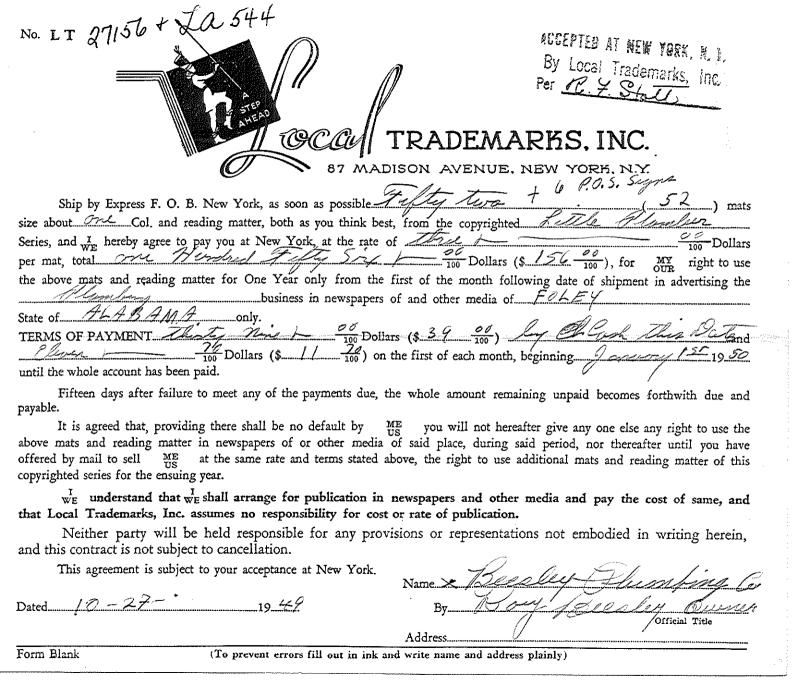
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Local Iradionnarks Inc.

Roy Busley Ind and Truding of Bushing &

> macount Filed 1-21-50

almurdwhiting



LCCAL TRADEMARKS	S, INC.,	Ĭ	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
	Plaintiff,	Ĭ	000112.19
		Ĭ	
ROY BEESLEY IND		I	No. 1531
TRADING AS BEESI COMPANY,		Ĭ	
	Defendant.	Ĭ	

Now comes the plaintiff above-named, by A. S. Whiting, its attorney of record and shows unto the court that, as appears by the record in this cause, the defendant was duly served with process herein on July 24, 1950; that more than thirty days has since elapsed and that no appearance nor pleas have been filed by the defendant.

Wherefore, the premises considered, plaintiff prays for a judgment by default herein in favor of the plaintiff and against the defendant upon the sworn itemized account annexed to the complaint which the plaintiff offers in evidence and upon the original contract in writing, set out in Count 1 of the complaint, hereto annexed, which the plaintiff also offers in evidence, for the principal amount of \$117.00 and \$4.60 interest, aggregating \$121.60, plus the costs of this suit.

Dated this 29th day of August, 1950.

Attorney for Plaintigf

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ALICE J. DUCK, Clerk

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ALMUR S. WHITING
ATTORNEY AND COUNSELOR AT LAW
SUITE 602 ANNEX FIRST NATIONAL BANK BUILDING
MOBILE 6, ALABAMA

TELEPHONES: OFFICE: 2-3604 RESIDENCE: 6-6226

August 29, 1950

P. O. BOX 988

Hon. Alice J. Duck Circuit Clerk Bay Minette, Ala.

Dear Madam:

Re: Local Trademarks, Inc.

Vs: Roy Beesley
Case #1531

Pursuant to our long distant telephone conversation I beg to enclose herewith motion for default judgment in the above matter, together with original contract signed by the defendant forming a basis of Count 1 of the complaint. Will you please present this to the court for instant attention and oblige.

Yours very truly,

W/em Encls.



Ship by Express F. O. B. New York, as soon as	s possible Fifty Thro & 6 Dog or
size about 1 Col. and reading matter, both as vo	ou think best, from the copyrighted LITTLE PLUMBER
Series, and I hereby agree to pay you at New York	best, from the copyrighted LITTIE, PLUMBER
P-1	100 1/01/255
the above mats and reading matter for One Year only Plumbing business in	y from the first of the month following date of shipment in advertising the newspapers of and other media of Poley
State of Alabama only	The or and other media of
TERMS OF PAYMENT Thirty-Nine Eleven 700 Dollars (\$ 11 until the whole account has been paid.	— 100 Dollars (\$ 39 00) By cash this date and 100 on the first of each month, beginning January 19 50
Fifteen days after failure to meet any of the paym payable.	nents due, the whole amount remaining unpaid becomes forthwith due and
above mats and reading matter in newspapers of or oth offered by mail to sell ME at the same rate and terr copyrighted series for the ensuing year.	ault by ME you will not hereafter give any one else any right to use the her media of said place, during said period, nor thereafter until you have ms stated above, the right to use additional mats and reading matter of this
WE understand that WE shall arrange for publication that Local Trademarks, Inc. assumes no responsibility	lication in newspapers and other media and pay the cost of same, and
and this contract is not subject to cancellation.	any provisions or representations not embodied in writing herein,
This agreement is subject to your acceptance at New	w York.
Dated 10-27-	
Dated 19 49	By Roy Beesley, Owner
Form Blank (To protect of the	Address Official Title
(10 prevent errors fill or	out in ink and write name and address plainly)

STATE OF NEW YORA)
)ss
County of New York)

Robert F.Stott, Manager of Local Trademarks, Inc., a corporation duly organized, existing and doing business under and by virtue of the laws of the State of New York, being duly sworn, deposes and says that he has knowledge of the facts hereinafter set forth: that he makes this affidavit for and in behalf of

one Hundred and Seventeen 000000 Dollars, over and above and after allowing all just credits, deductions and legal set-offs; that said amount is due and wholly unpaid, that the consideration therefore was the reservation of territory and the right to use copyrighted advertising material known as LITTLE PLUMBER Series in territory provided in contract, copy of which is hereto annexed marked "Exhibit A"; that "Exhibit B" also hereunto annexed is a true and correct account taken from the books of original entry of said claimant, and that no part of said debt is for usurious interest.

Sworn to and subscribed before me, this)

day of June/15th, 19 50

pobert Fisher

LOCAL TRADEMARKS, Inc.

Beesley Plumbing Co. 87 MADISON AVENUE (Roy Beesley, Owner) Foley, Alabama NEW YORK, June 15th Right to use 52 Mats and and copy 11-2-49 o Signs as per contract \$156 00 10-27-49 Credits: 11-2-49 \$39.00 \$117 00 Balance

LOCAL TRADEMARKS, INC.,		I	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
	Plaintiff,	I	OUNTE PIRITEMA.
VS•		X	
ROY BEESLEY INDI		Ĭ	
TRADING AS BEESLE COMPANY,		Ĭ	
	Defendant.	Y	

COUNT 1

Plaintiff claims of the defendant \$117.00 damages due by the defendant to the plaintiff for that on, towit: October 27, 1949, the defendant by written instruement in writing duly executed by him, by and between himself and the plaintiff, ordered the plaintiff to ship to him F.O.B. New York, as soon as possible, certain mats and signs, including reading matter from the copyrighted "Little Plumber" series, the defendant agreeing to pay to the plaintiff in New York, at the rate of \$3.00 per mat, a total of \$156.00, the defendant to be accorded the right to use said mats and reading matter for one year only from the first of the month following date of shipment in advertising the plumbing business in newspapers of and other media at Foley, Baldwin County, Alabama, only; that the terms of payment, as provided, in said contract, was the sum of \$39.00 to be paid by defendant of even date with said contract and \$11.70 on the first of each month, begining January 1, 1950, until the whole account should be paid; that said contract provided that neither party thereto should be held responsible for any provision and representation not embodied in writing therein and that said contract should not be subject to cancellation; that the defendant at the date of said contract paid the sum of \$39.00 to apply on account, but has made no further payments whatever; that although the plaintiff duly shipped and delivered to the defendant the articles and reading matter as set out and described in said contract, the defendant failed and refused and continues to fail and refuse to pay the balance here sued for of \$117.00, claimed by the plaintiff to be due from the defendant under said contract; that a true and correct copy of said contract is hereto attached, marked "Exhibit A" and made a part of this acount, as if fully set out herein. That the sum of \$117.00 is still unpaid, together with the interest thereon. Wherefore the plaintiff claims damages of the defendant for the said sum, together with the

.

COUNT 2

Plaintiff further claims of the defendant the sum of \$117.00 due by the defendant to the plaintiff as shown by itemized statement of account, verified by affidavit hereto annexed, which said sum with the interest thereon is due and unpaid.

#602 1st Carrow for Plantiff Motile

NOTE: The defendant may be found at Foley, Alabama.

Plaintiff further claims of the defendant the sum of \$117.00 due by the defendant to the plaintiff as shown by itemized statement of account, verified by affidavit hereto annexed, which said sum with the interest thereon is due and unpaid.

7027

No 1531

LOCAL TRADEMARKS,	INC.,)	(
LOCAL TRADEMARKS,	Plaintiff,)		IN THE CIRCUIT COURT OF
POV DEPOT)	(BALDWIN COUNTY, ALABAMA
ROY BEESLEY, indiv trading as BEESLEY COMPANY.	ridually and PLUMBING)	(AT LAW
oom ant,	1 ⁸)	(CASE NO 1531
	Defendant.)	(

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared Roy Beesley, who is known to me, and who after being by me first duly and legally sworn, deposes and says under oath as follows:

That an order was filed upon affiant requiring him to file a statement of assets in the above styled cause; that in answer thereto affiant says that he owns no property, either real or personal, other than wearing apparel and personal effects; that the Sheriff of Baldwin County has levied an execution on the business known as Beesley Plumbing Company and on the assets of your affiant and that a Sheriff's Sale has been conducted and that all property of your affiant, other than wearing apparel and personal effects, was sold at said sale; that affiant has less than One Hundred Dollars (\$100.00) cash and has no money on deposit to his credit in any bank.

Sworn to and subscribed before me, a Notary Public, on this

the // day of July, 1951.

Notary Public, Baldwin County State of Alabama

C. G. C.

State of the state

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Honera Erbyo

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SUMMONS AND COMPLAIN	T 5 5		Bald	lwin Times
THE STATE OF A	as at	CIRCUIT No.1561	COURT, BALDWIN	COUNTY
BALDWIN COU	MTY 5	11 20 C	TER <u>a</u>	і Д, 19
				e and
TO ANY SHERIFF OF THE S	TATE OF ALABAMA:		<u> </u>	
You Are Hereby Commanded	to Sumfion Ro	y Beesley, individu	ally and Trading	s as BEESI
PLUMBING CO		A		
2 10102233	- <u> </u>			
			and the second s	vienet Mari
to appear and plead, answer of the Circuit Court of Baldwin	or demur, within thirty of County, State of Alabar	days from the service he	to the second se	
	or demur, within thirty of County, State of Alabar	days from the service he	reof, to the complaint	<u>Indivi</u> dus
the Circuit Court of Baldwin	or demur, within thirty of County, State of Alabar	days from the service he	reof, to the complaint	<u>Indivi</u> dus
the Circuit Court of Baldwin and Trading as BEESLEY	or demur, within thirty of County, State of Alabar PLUMBING CO	days from the service he	reof, to the complaint	Individus
the Circuit Court of Baldwin and Trading as BEESLEY	or demur, within thirty of County, State of Alabar PLUMBING CO	days from the service he	reof, to the complaint ast Roy Beesley, Defend Plai	Individus
the Circuit Court of Baldwin and Trading as BEESLEY by LOCAL TRAI	or demur, within thirty of County, State of Alabar PLUMBING CO	days from the service he	reof, to the complaint ast Roy Beesley, Defend Plai	Individus

Defendant lives at	RECEIVED IN OFFICE	Jedder Sheriff	mon	ž ž	Wey Bushy						0 0 1 1 1 1 1	Contact (Mel Brassheritt	Gellergh Alent Deputy Sheriff	
No. 153GJQUOJJYPage THE STATE OF ALABAMA	CIRCUIT COURT	RWXX LCCAL TRADEMARKS, INC		Plaintiffs vs.	ROY BEESLEY, Individually and	Trading as BEESLEY PLUMBING CO Defendants	SUMMONS and COMPLAINT	Filed 7-21-50 , 19	Chiach halled at Clerk		Almur Whiting	Figurui's Auoiney	Defendant's Attorney	

LOCAL TRADEMARKS, INC.,) IN THE CIRCUIT COURT OF BALDWIN
PLAINTIFF,	COUNTY, ALABAMA. AT LAW.
)
ROY BEESLEY, Individually) CASE NO. <u>1531</u> .
and trading as BEESLEY PLUMBING COMPANY,	
DEFENDANT •	
To any Sheriff of the State of Al	abama:
This day came the plaintiff,	by its attorney, and it appearing
to the Court that on the 17th day	of May, 1951, the plaintiff filed
with the Clerk of this Court a re	equest for a notice to issue to the
defendant, requiring said defends	ent to file a statement of assets as
provided by law, and on, to-wit,	May 17, 1951, the Clerk of this Court
issued notice to said defendant a	and the said notice was served by the
	defendant on May 26, 1951; and it
further appearing to the Court th	nat the defendant has failed to file
	ided by law; It is therefore ordered
by the Court that citation be is:	sued requiring the defendant to appear
	-day of July , 1951 at 10:00 · M.,
	be held in contempt of this Court for
failing to file said statement of	f assets, as required by law.
It is further ordered by the	e Court that a copy of this order be
served upon the said defendant b	y the Sheriff of this County.
These are therefore to comm	and you, that you make known the
	oy Beesley and that he be and appear
before this Court on 12th da	y of July, 1951, at 10:00. M.,
and show cause why he should not	be held in contempt of this Court for
failing to file said statement of	f assets, as required by law; and have
you then and there this writ wit	
Witness, Alice J. Duck, Cle	erk of the Circuit Court of Baldwin County,
Witness, Alice J. Duck, Cle	of frame, 19 67
	Clerk.
	0207.11
	iff's Return.
Executed by serving a copy	of the within on Roy Beesley, this the

Sheriff of Baldwin County, Alabama.

THE CONTROL . and tribing as Beleging Finishive ROY SEESIEN, INCLVIDAGILY . OLSE NO. COUNTY, SINGERS OF THE IN WHE CHECHEE CORES OF BEILDHIN TOOFE WENDERSES INC.

To any Shariff of the State of Alabama:

Desiration to tente more than the second

by the Court that citation be issued requiring the defendant to appear said statement of assets as provided by law; It is therefore ordered further appearing to the Court that the defendant has falled to fille Shariff of Baldwin County on the defendant on May 26, 1951; and it issued mobiles to said defendant and the said motice was served by the provided by law, and on, to-wit, May 17, 1851, the Clerk of this Court defendant, requiring said defendant to fille a statement of assets as with the Clark of this Court a request for a notice to issue to the to the Court that on the 17th day of May, 1951, the plaintiff filled This day came the plaintiff, by the attorney, and it appearing

failing to file soid statement of essets, as required by law. and snow cause why he should not be held in Contempt of this Court for

served upon the said defemiant by the Shariff of this County. It is further erdered by the Court that a copy of this order be

you then and there this with with your endorsexant thereon. failing to file said statement of essets, as required by law; and have and show cause why he should not be held th contempt of this Court for before this Court on 12 24 day of feelen, 1951, at 177 27. premises eforesaid to the said Rey Beasley end that he he and appear These are therefore to command you, that you make known the

Witness, Alice J. Duck, Clerk of the Circuit Court of Baldrin County,

statemen, the transfer of the day of Angelian in the

day of

granding a garant

Executed by serving a copy of the within on Roy Beesley, this the

LOCAL TRADEMAR	KS, INC.,)					A STATE OF THE STA
	PLAINTIFF,)		CIRCUIT			
-vs-		.)	COUNTY	, Alabani		Luft.ve .	
ROY BEESLEY, I	ndividually BEESLEY PLUMBING) .	CASE NO). <u>15</u>	31 //.	1 4 .	
COMPANY,	هيلا لا يُو يُنِي في كينيانيان فيه الوسلى - على - سلم المناطقيات البحة البيد المخاطفيات)		material Section 1995			S.
	DEFENDANT.)					South Control

Now comes the plaintiff in the above styled cause and shows that on, to-wit, May 17, 1951, 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, Tit. 7, Section 903; That said notice was duly and personally served on the said defendant on to-wit May 26, 1951; that the said defendant has willfully refused to file such statement.

The premises considered, the plaintiff petitions the Court that the said Roy Beesley 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.

STATE OF ALABAMA

MOBILE COUNTY

A. S. Whiting, being first duly sworn, saith that he is attorney of record for the plaintiff in this cause and, with due authority makes this affidavit for and its behalf; that the matters and things set out in the foregoing petition are true to the peace affiant's information and belief.

Subscribed and sworn to before me this

day of June A. D., 1951.

Mobile, County, Alabama.

Heceived in Sherm 1976
this Zday of HIXINS, Shorth
TAYLOR WILKINS, Shorth nv 1531
RECORDED

Local Tradesmark Executed 7 - 6 is serving copy of within Summons and Complaint on Lolling Steadle Deputy Sheritt Fileds 6.29.37 Rence sent