KAISER AGRICULTURAL CHEMICALS,
Division of Kaiser Aluminum & IN THE CIRCUIT COURT OF
Chemical Sales, Inc., A Corporation,
Plaintiff,
VS.

RAYMOND SANSPREE,

Defendant.

#### PETITION TO CITE DEFENDANT FOR CONTEMPT

NOW COMES the Plaintiff in the above styled cause and shows that a Notice was heretofore issued out of this Court by the Clerk thereof, requiring the above named defendant to file a statement of his assets as required by Title 7, Section 903 of the Code of Alabama; that said notice was duly and personally served on the said Defendant on the 20th day of January, 1973; that the said Defendant has willfully refused to file such statement.

The premises considered, Plaintiff petitions the Court that the said Raymond Sanspree 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.

JAMES R. OWEN
Attorney for Plaintiff
410 Courthouse Square
Bay Minette, Alabama 36507

STATE OF ALABAMA )

BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared James R. Owen, who first being duly and legally sworn deposes and says: That he is the attorney for the Plaintiff in the above styled cause; that he has read over the foregoing Petition and that the facts stated therein are true.

Sworn to and subscribed before me on this the 3/of day of October, 1974.

FILED

OCT 3 1 1974

Notary Public, Baldwin County, Alabama

EUNICE B. BLACKWON CIRCUIT

#### DECREE

Upon consideration of the Petition filed herein praying that the said Defendant be cited as for a contempt, it is,

ORDERED, ADJUDGED AND DECREED by the Court that the said Raymond Sanspree be and appear before the Court on the day of 1975, at 9:00 a.m., and show cause, if any he have, why he should not be held in contempt for will-fully refusing to file said statement of assets as required by law.

Let a copy of said Petition and this Decree be served forthwith upon the said Defendant.

ORDERED on this the 28% day of January, 1975.

J. CJACOL A. MADLANDE CJRCUIT JUDGE

Defendant may be served at: Foley, Alabama

KAISER AGRICULTURAL C Division of Kaiser Al Chemical Sales, Inc.,	uminum &	,	IN THE CIRCUIT COURT OF
	Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.		)	AT LAW NO. 8923
RAYMOND SANSPREE,		)	
	Defendant.	)	
TO ANY SHERIFF IN THE	STATE OF ALABAM	A:	GREETINGS,
YOU ARE HEREBY COMMAN CITE DEFENDANT FOR CO RAYMOND SANSPREE OF F YOUR SAID SERVICE AND WITNESS MY	NTEMPT AND ORDER COLEY, ALABAMA, AND OF THIS NOTICE.	UP ND :	ON THE ABOVE NAMED

#8923

KAISER AGRICULTURAL CHEMICALS, DIV. OF KAISER ALUMINUM & CHEMICAL SALES, INC. A CORP.

VS:

RAYMOND SANSPREE FOLEY, ALABAMA RECEIVED

JAN 28 1975

THOMAS H. BENTON SHERIFF

PETITION & DECREE

943.286

FILED

JAN 28 1975

EUNICE B. BLACKMON GIRGUIT

OWEN & BALL Attorneys for Plaintiff

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KAISER AGRICULTURAL CHEMICALS,
Division of Kaiser Aluminum &
Chemical Sales, Inc., a corporation,)

Plaintiff,

VS.

RAYMOND SANSPREE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 8923

NOTICE

TO: Raymond Sanspree

Take notice that whereas the plaintiff in the above styled cause has requested, in writing, the undersigned Clerk of said court, to issue notice to you, as defendant, in the above styled cause and in the judgment therein, requiring you to file a statement in writing, under oath, of all of your assets, as provided by Title 7, Section 903 of the Code of Alabama 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 endorsed "No Property Found" by the Sheriff of Baldwin County, Alabama, 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 and 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 amount upon each and the owner or holder of such liens, encumbrances or mortgages.

WITNESS my hand this day of January, 1973.

Greek B. Blackman

TO ANY SHERIFF OF THE SATE OF ALABAMA:

You are hereby commanded to serve the following notice upon the above named Raymond Sanspree and make due return of your said service and of this notice.

Gunial & Blackmo

KAISER AGRICULTURAL CHEMICALS, Div. of Kaiser Aluminum & Chemical Sales Inc. of Corp.

VSP

RAYMOND SANSPREE

## RECEIVED

JAN 1 6 1973

TAYLOR WILKINS

Notice of Discovery of Assets

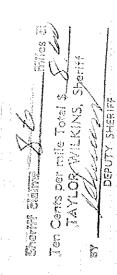
FILED

JAN 15 1973

EUNICE B. BLACKMON CIRCUIT

J. R.Owen,

Attorney for Plaintiff



STATE OF ALABAMA )
\*
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Raymond Sanspree 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 the same, then and there to answer the complaint of Kaiser Agricultural Chemicals, Division of Kaiser Aluminum & Chemical Sales,

WITNESS my hand this  $\underline{g}$  day of October, 1969.

Alica Duch

THE DEFENDANT RESIDES AT FOLEY, ALABAMA.

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & Chemical Sales, Inc., a corporation,

Plaintiff,

VS.

RAYMOND SANSPREE,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW 700.8922

Defendant.

COMPLAINT

COUNT ONE

Plaintiff claims of the defendant Two Thousand Dollars (\$2,000.00), balance due by promissory note made by him on the 16th day of August, 1966, and payable on the 15th day of November, 1966, with interest thereon at the rate of eight percent (8%) per annum. Plaintiff avers that in and by the terms of the said note the defendant agreed to pay a reasonable attorney's fee, if the said note was not paid at maturity and was placed in the hands of an attorney for collection, which fee plaintiff avers to be \$300.00 and which it herewith claims.

Attorney for Plaintiff

OCT 9 1969

ALGE J. DUCK CLERK REGISTI

2/ 11-22-6

Kaiser agriculture Chemical Div. of Kaiser

Raymond Sansprie

erved a copy of the within the Caynesses Raymond Langueses

Heart Court

oct 9 1969

ALUE OF DUM CLERK REGISTER

Jas R, Deven

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & Chemical Sales, Inc., A Corporation,		)		
		., A Corporation,	)	IN THE CIRCUIT COURT OF
		Plaintiff,	)	BALDWIN COUNTY, ALABAMA
7	VS.		)	AT LAW NO. 8923
RAYMOND SA	ANSPREE,		)	
		Defendant.	<u>)</u>	

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING PETITION TO CITE DEFENDANT FOR CONTEMPT AND ORDER UPON THE ABOVE NAMED RAYMOND SANSPREE OF FOLEY, ALABAMA, AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

WITNESS MY HAND THIS 3/1/DAY OF OCTOBER, 1974.

Louis B. Blackman CLERK, CIRCUIT COURT

### DECREE

	opon consideration of the retition filled herein praj
	that the said Defendant be cited as for a contempt, it is,
	ORDERED, ADJUDGED AND DECREED by the Court that the
	said Raymond Sanspree be and appear before the Court on the
	day of, 1974, at 9:00 a.m., and show
	cause, if any he have, why he should not be held in contempt f
	willfully refusing to file said statement of assets as require
	by law.
	Let a copy of said Petition and this Decree be serve
	forthwith upon the said Defendant.
	ORDERED on this the day of October, 1974.
	day of devoter, 1974.
	CIRCUIT JUDGE
	Defendant may be served at:
The contract of the Contract o	Folev. Alabama

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & )
Chemical Sales, Inc., a corporation,)

Plaintiff,

VS.

RAYMOND SANSPREE,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2923

Defendant.

#### REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered a judgment against the defendant in the above styled cause for the sum of Two Thousand Eight Hundred Ten and no/100 Dollars (\$2,810.00) and costs in the amount of \$35.10 and 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 this court issue a notice to the above named defendant, requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character and description wheresoever located as provided by Title 7, Section 903 of the Code of Alabama.

Attorney for Plaintiff

FILED

JAN 15 1973

EUNICE B. BLACKMON CIRCUIT

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & Chemical Sales, Inc., a corporation,

Plaintiff,

VS.

RAYMOND SANSPREE,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 8923

Defendant.

#### REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered a judgment against the defendant in the above styled cause for the sum of Two Thousand Eight Hundred Ten and no/100 Dollars (\$2,810.00) and costs in the amount of \$35.10 and 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 this court issue a notice to the above named defendant, requiring him, within thirty days from the service of such notice, to file in this cause a statement in writing, under oath, of all of his assets of every kind, character and description wheresoever located as provided by Title 7, Section 903 of the Code of Alabama.

Attorney for Plaintiff

#### DECREE

Upon consideration of the Petition filed herein praying that the said Defendant be cited as for a contempt, it is,

ORDERED, ADJUDGED AND DECREED by the Court that the said Raymond Sanspree be and appear before the Court on the day of Appearate, 1974, at 9:00 a.m., and show cause, if any he have, why he should not be held incontempt for willfully refusing to file said statement of assets as required by law.

Let a copy of said Petition and this Decree be served forthwith upon the said Defendant.

ORDERED on this the AZO day of October, 1974.

Jeffers A masleberry CIRCUIT JUDGE

Defendant may be served at: Foley, Alabama

KAISER AGR					)						
Chemical S				tion,	)	IN	THE	CIRC	TIUC	COURT	OF
		Plaintif	ſf,		)	BAI	LDWIN	1 COI	JNTY,	, ALAB	AMA
V	s.				)	ΑT	LAW	NO.	8923	3	
RAYMOND SA	NSPREE,				)						
		Defendan	ıt.		)_						
TO ANY SHE	RIFF IN TH	E STATE	OF	ALABAM	A:	GRE	EETIN	IGS,			

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING PETITION TO CITE DEFENDANT FOR CONTEMPT AND ORDER UPON THE ABOVE NAMED

RAYMOND SANSPREE OF FOLEY, ALABAMA, AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

WITNESS MY HAND THIS \_3/st DAY OF OCTOBER, 1974.

Lunci B. Blackmon
CLERK, CIRCUIT COURT

## RECEIVED

NOV 6 1974

#8923

TAYLOR WILKINS

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MACKETS

TAYLOR

Needs per Court Dr.

KAISER AGRICULTURAL CHEMICALS, DIV. OF KAISER ALUMINUM & CHEMICAL SALES, INC. A CORPORATION

VS:

RAYMOND SANSPREE



Deft. Address: Foley, Ala.

OCT 3 1 1974

EUNICE B. BLASKIKON CHECK

James R. Owen, Attorney for Plaintiff

Ely service on Received

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum &	ð	
Chemical Sales, Inc., a Corporation,	Ĭ	
Plaintiff,	Ĭ	CASE NO. 8923
VS.	Ŏ	
RAYMOND SANSPREE,	Ĭ	
Defendant.	Ĭ	

#### INTERROGATORIES

Now comes the Plaintiff and propounds the following interrogatories to the Defendant, Raymond Sanspree:

- 1. State your name, address and telephone number.
- 2. What is the date of your birth?
- 3. Do you live in an apartment or in a private house?
- 4. If you live in a private house, is it owned by either your wife or any member of your family or a relative? If so, state when it was bought, for how much and whose money was used?
  - 5. How many rooms do you occupy?
  - 6. Have you a lease?
  - 7. Give the name and address of your landlord.
  - 8. What is the amount of your rent?
  - 9. Who pays the rent?
  - 10. Is the rent paid by cash or check?
  - 11. Is the rent paid to date?
  - 12. Have you any boarders or sub-tenents?
- 13. If so, give their names and the amount of rent paid by each.
- 14. If the rent or any other bills are paid by check, give the particulars thereof, the name of the drawer of such checks and the banks upon which they are drawn.
- 15. Are you married? If so, give your wife's first name and your wife's maiden name?
  - 16. Have you any children? If so, give their names,

ages and addresses.

- 17. What is your usual occupation?
- 18. Are you presently in business or employed? If so, give the name and address of such business or employer.
  - 19. What is your social security number?
- 20. If you are presently employed, state the particulars of any contract of employment and the amount of salary, commissions or other compensation which you are to receive and the amount of any arrears thereof.
- 21. If your wife or children are employed or in business, give the name and address of such employment or business and the salary or income derived therefrom.
- 22. If you are not the sole supporter of your family, state the amount of the contribution of each member of your family toward the support of your home.
- 23. If you are employed in business, state whether you or any members of your family or other relatives are/or at any time were proprietors, part owners, stockholders, directors or officers of any such business.
- 24. State what business you have conducted and what position you have held in the last five (5) years.
- 25. Are you an officer, director or stockholder of any corporation? If so, give the details.
- 26. Is your wife an officer, director or stockholder of any corporation? If so, give the details.
- 27. Have you in your own name or jointly any bank account, commercial, savings or otherwise? If so, state where and the amount of the balance therein.
  - 28. When and where did you last have such a bank account?
- 29. Do you have power of attorney or other authority to sign checks or other instruments for the payment of money on any bank account?
- 30. Has your wife a bank account? If so, state the name and address of the bank and the amount of the balance therein.

- 31. State the source of the money in your wife's bank account.
- Have you or your wife a safe deposit box? If not, when did you last have one?
- 33. Give the name and address of any bank or safe deposit company in which such safe deposit box is or was maintained.
- 34. Have you the right of access to any safe deposit If so, give the details.
  - Have you any accident, health or life insurance?
  - If so, answer the following questions: 36.
    - The name of the company.

Each policy number. в.

- The amount, type and date of issuance of each life insurance policy. C.
- The name and address of beneficiary of each D. life insurance policy.
- The date and particulars of any change of Ε. beneficiary.
- The particulars of any assignment or assignments F.
- of life insurance policy. The dates and amounts of any loan against such policies.
- If you have borrowed on any life insurance policy 37. what did you do with the money?
- 38. Are you receiving or have you any claim for disability payments on any insurance policy?
- If so, give the name of the company, the number of the policy and the particulars of the policy and the amount thereof.
- Is there any fire insurance on the furniture in your home? If so, what is the amount, the name of the company issuing the same and in whose name is it issued?
- 41. Where are the policies of insurance referred to above?
- 42. Have you an automobile driver's license and if so, what car do you drive?

- 43. Do you or your wife own or have any interest in any of the following:
  - Real Estate. Α.
  - Stocks, bonds or other securities. В.

  - Mortgages on real property or personal property. Promissory notes, drafts, bills of exchange or D. other commercial paper.
  - Judgments. E.
  - Jewelry or antiques. F.
  - Stamp collections or coin collections. G.
  - Savings bonds.
  - Automobile or truck. I.
  - Patents, inventions, trademarks or copyrights. J.
  - Joint ventures or other business enterprises. Κ.
  - Warehouse receipts, bills of lading or other documents of title.
- 44. Do you or your wife own any other property not enumerated above? If so, give full particulars thereof.
- 45. If you or your wife own any of the property described in Question 43, give the full particulars thereof.
- If any of such property is mortgaged, pledged, encumbered or subject ot any conditional bill of sale, give the full details and status thereof.
- 47. Have you or your wife any personal property in pawn? If so, give the particulars thereof.
- 48. Have you applied for a loan from any bank, finance company or other lending institution in the last three (3) years? If so, what disposition was made of such application?
- 49. If such loan was obtained, what did you do with the proceeds thereof?
- 50. Have you in the last three years acted as co-maker, endorser, or guarantor of any loan? If so, give the particulars thereof.
- 51. Have you issued any financial statement in the past three (3) years? If so, to whom and when? If your answer is "yes", attach a copy of any such financial statement furnished by you in the last three (3) years.
- 52. Have you or your wife purchased or are you or your wife buying any articles on the installment plan? If so, give the full details thereof, the amount thereof and the method by which installment payments are being made.

- 53. Have you or your wife any interest in the estate of any deceased person? If so, give full particulars thereof.
- 54. Are you or your wife the beneficiary of any trust? If so, give the full particulars thereof.
- 55. Have you or your wife inherited any money or property? If so, give the full particulars thereof.
- 56. Are you the beneficiary of any will or policy of insurance?
- 57. Are you the Plaintiff or Defendant in any Court action or proceedings other than this case? If so, give the particulars thereof.
- 58. Are there any judgments of record against you? If so, give the dates, amounts, the Courts where rendered and the name of the judgment creditors.
- 59. Have you made any payments on any such judgments? If so, give the full details thereof.
- 60. Have you any securities with any stock brokerage firms?
- 61. Have you any account with any stock broker or commodity broker? If so, give the particulars thereof.
- 62. When did you last have any such account? If so, give the full particulars thereof.
- 63. Have you now or did you ever have power of attorney or authority over any other stock, bond or other security or commodity account? If so, give the full particulars thereof.
- 64. What books and records do you keep, showing your receipts and disbursements?
- of money other than as already described? If so, state when and the amount; give the particulars of any checks received and state what was done with the money.
- 66. Have you assigned any cause of action, judgment, insurance policy, salary, income, or disability payments?
  - 67. Have you transferred any other property within the

- past five (5) years? If so, describe the property and give the full details of any such transfer.
- 68. Have you filed any trade names, certificates or partnership certificates? If so, under what name.
- 69. What are your average monthly expenses and how are they met?
- 70. Are you making payments to any creditor? If so, give the full details thereof.
- 71. Did you file Federal or State Income Tax Returns within the last three (3) years? If so, furnish copies of such returns.
- 72. Do you belong to any organization, club or union? If so, give the particulars thereof.
- 73. Has any kind of license, permit or appointment been issued or granted to you by any State, City or Federal Government or agency or department thereof? If so, give the details thereof.
- 74. Are you entitled to any money from any State, City or Federal Government or agency or department thereof? If so, give the details thereof.
- 75. Does anyone owe you money? If so, give the details thereof.
  - 76. Are you unable to pay your debts?
  - 77. Are you willing to be adjudged a bankrupt?
  - 78. Are you a party to any contract of any kind?
- 79. What is the total of your liability, exclusive of this judgment, and what are the names and address of your creditors?
- 80. When and for what purposes were these liabilities incurred?

OWEN AND BALL

FILED

FFR 17 1976

JAMES R. OWEN
Attorneys for Plaintiff
410 Courthouse Square
Bay Minette, Alabama 36507

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EUNICE B. BLACKMON SIER

KAISER AGRICULTURAL CHEMICALS,	
Division of Kaiser Aluminum & Chemical Sales, Inc., a corporation	Circuit Court, Baldwin County Alabama
Plaintiff	Civil Action No8923
MATHOND SANSI REE	February 17., 1976.
Defendant	
To Any Sheriff or any person authorized by Rule to effect service in the State of Alabama:	4 (a) (3) of the Alabama Rules of Civil Procedure Interrogatories
You are hereby commanded to serve this upon defendant Raymond Sanspree, Fo	summons and a copy of the complaint in this action
Each defendant is required to serve a co	Interrogatories  py of a written answer to the complaint upon
James R. Owenat	torney of record for the plaintiff whose address is
410 Courthouse Square, Bay Minette of this summons excluding the day of service of the answer with the Clerk of this Court at the time of for the Plaintiff or within a reasonable time thereby default may be entered against that defendant	s summons and to file the original of said written service of the answer upon the attorney of record eafter. If any defendant fails to do so, a judgment
Date February 17, 1976	Clerk of Circuit Court

Civil Action No89	23
STATE OF ALA Baldwin Coun	
Circuit Cour	
KAISER AGRICULTURAL CH sion of Kaiser Aluminu Sales, Inc., a corpora	m & Chemical
	Plaintiffs
vs. RAYMOND SANSPREE	
	Defendants
summons	
Filed	19
FILED	
FEB 17 1976	

# EUNICE B. BLACKMON GIRCUIT

Jame	s R. Owen		•••
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	; :	Defendant's Attorne	у

#### Defendant lives at

Foley, Alabama
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BY DEPLY VISHERUFF.
Sheriff Deputy Sheriff