

GOLD PLATE FOODS, INC.  
Plaintiff

IN THE CIRCUIT COURT OF

vs;

BALDWIN COUNTY, ALABAMA

B & C. PRODUCE COMPANY, INC.,  
Defendant

AT LAW, CASE NO. 8971

WRIT OF DISCOVERY

TO B & C Produce Co., Inc. Foley

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 B & C Produce Co. 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, CHOSSES 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 7th DAY OF August,  
1970.

Alice J. Huckle  
CLERK

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TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON THE ABOVE NAMED B & C Produce Co., Inc. AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Alice J. Huckle  
CLERK

GOLD PLATE FOODS, INC.,  
a corporation

Plaintiff

-VS-

B & C PRODUCE COMPANY, INC.  
Defendant

CIRCUIT COURT  
IN THE COURT OF GENERAL  
SESSIONS OF MOBILE COUNTY,  
ALABAMA

CASE NUMBER: 8971

WRIT OF DISCOVERY

The Plaintiff herein having recovered on the  
26 day of March, 1970, a judgment against  
the Defendant in the above styled cause for the sum of  
\$ 131.84 and cost and such execution having been  
returned and endorsed by the Sheriff of Mobile County,  
Alabama "no property found", Plaintiff now request in  
writing that the Clerk of this Court will issue notice  
to said Defendant, requiring him within thirty (30) 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, description and wheresoever  
located, as provided by Code of Alabama of 1940, Title  
7, Section 903.

ENGEL AND SMITH, ATTORNEYS  
For Plaintiffs

BY: Desmond B. Toler

Member Appearing

PLEASE SERVE THE DEFENDANT AT:

Foley, Alabama

FILED

AUG 7 1970

ALICE J. DUCK

CLERK  
REGISTER

GOLD PLATE FOODS, INC.,  
a corporation

Plaintiff

-VS-

B & C PRODUCE COMPANY, INC.  
Defendant

~~CIRCUIT COURT~~  
IN THE COURT OF GENERAL  
~~SESSIONS OF MOBILE COUNTY,~~  
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ENGEL AND SMITH, ATTORNEYS  
For Plaintiffs

BY: Desmond B. Taler

Member Appearing

PLEASE SERVE THE DEFENDANT AT:

Foley, Alabama

FILED

AUG 7 1970

ALICE J. DUCK

CLERK  
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Plaintiff

IN THE CIRCUIT COURT OF

vs;

BALDWIN COUNTY, ALABAMA

B & C. PRODUCE COMPANY, INC.,  
Defendant

AT LAW, CASE NO. 8971

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WITNESS MY HAND THIS 7th DAY OF August,  
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Alice J. Huckle  
CLERK

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Alice J. Huckle  
CLERK

CASE NO. 8971

GOLD PLATE FOODS, INC.,  
A Corp. Plaintiff

vs:

B & C PRODUCE CO., INC.,  
Foley,

Defendant

WRIT OF DISCOVERY

Engel & Smith, Attys.

GOLD PLATE FOODS, INC.,  
a corporation,

-VS-

B & C PRODUCE COMPANY,  
INC., a corporation and  
X, Y, and Z, individuals,  
partnerships, corporations,  
or associations the names  
of which are unknown at  
this time and when ascer-  
tained will be added by  
amendment,

Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

A T L A W

CASE NUMBER: 8971

The Plaintiff claims of the Defendant, ONE HUNDRED  
THIRTY-ONE and 84/100 (\$131.84) DOLLARS, due from it  
by account, which sum of money together with interest thereon,  
is still due and unpaid.

An itemized statement of the account sued on,  
verified by the affidavit of a competent witness is attached  
hereto as Exhibit "A" and made a part hereof.

ENGEL AND SMITH,  
Attorneys for Plaintiff

BY: Desmond B. Toler

DESMOND B. TOLER

DEFENDANT MAY BE SERVED AT:

Foley, Alabama

ENGEL AND SMITH  
ATTORNEY AT LAW  
910 VAN ANTWERP BLDG.  
P. O. BOX 1045  
MOBILE, ALABAMA

FILED

NOV 11 1969

ALICE J. DUCK CLERK  
REGISTER

EXHIBIT "A"

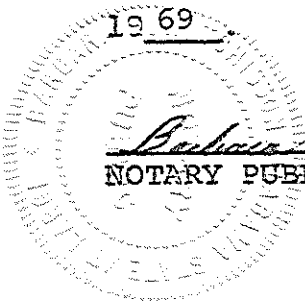
STATE OF ALABAMA )

COUNTY OF MOBILE )

Before me, the undersigned authority in and for  
said State in said County, personally appeared \_\_\_\_\_  
Carl M. Wilson, who is known to me,  
and known to be Secretary of  
Gold Plate Foods, Inc., and who, having  
been first duly sworn, deposes and says upon his oath that  
he has personal knowledge of the itemized account hereto,  
that the same is true and correct, and that no part of  
same has been paid.

Carl M. Wilson  
AFFIANT

Subscribed and sworn to and  
before me on this the 31st  
day of October,



Barbara E. Hutton  
NOTARY PUBLIC, ALABAMA STATE AT LARGE

My Commission Expires Aug. 15, 1972

Invoice  
STATEMENT

# Gold Plate Foods Company

Processor - Shipper - Broker

P. O. Box 411

Phone 205-943-5661

FOLEY, ALABAMA 36535

copy

4/10 1968

B. & C. Produce  
signed by Brackins

		DESCRIPTION	UNIT PRICE	AMOUNT
DATE	INVOICE NO.			
		4 Bags <sup>40</sup> / <sub>12</sub> DDT 50 WP192		51.80
		2 50# Bags MANZATE D		80.00
				<hr/> 131.80



SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8971

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

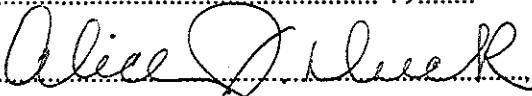
You Are Hereby Commanded to Summon ..... B & C PRODUCE COMPANY, INC., A CORP. & X, Y, Z,  
Individuals, partnerships, corporations, or associations the names of which are unknown  
at this time and when ascertained will be added by amendment,.....

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, State of Alabama, at Bay Minette, against..... B & C. PRODUCE COMPANY,  
..... or associations  
INC., A Corp. & X, Y, Z, individuals, partnerships, corporations..., Defendant.....

by GOLD PLATE FOODS, INC., A CORPORATION

..... Plaintiff.....

Witness my hand this..... 1st ..... day of November ..... 19.69..

 Clerk

## STATE OF ALABAMA

Baldwin County

## CIRCUIT COURT

GOLD PLATE FOODS, INC., A CORP.

Plaintiffs

vs.

B &amp; C. PRODUCE COMPANY, INC., A CORP.

Defendants

## SUMMONS AND COMPLAINT

Filed November 1, 1969

Alice J. Duck Clerk

Sheriff claims 100 miles at

Ten Cents per mile Total \$10.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Engel &amp; Smith

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received in Office

NOV 3 1969

19

Sheriff

I have executed this summons

this Nov 5 1969

by leaving a copy with

B &amp; C Produce Co. Inc

W. C. Brackin

Sheriff

Ten Cents per mile Total \$10.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Deputy Sheriff

100

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8971

.....TERM, 19.....

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filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against..... B & C. PRODUCE COMPANY,  
or associations  
..... INC., A Corp. & X, Y, Z, individuals, partnerships, corporations..... Defendant.....

by GOLD PLATE FOODS, INC., A CORPORATION  
..... Plaintiff.....

Witness my hand this..... 1st ..... day of November ..... 19.69

*Alice J. [Signature]* Clerk