Section 1		Moore Prtg Bay Minette
UMMONS _{Interrogatories}		W1001e 11 45 203
KAISER AGRICULTURAL CHEMICALS, Divis	ion	* 10
of Kaiser Aluminum & Chemical Sales,	TROTTE COTTRE OF BALDWIN	COUNTY, ALABAMA
Inc., a Corporation Plaintiff	\mathbb{J}	
♥s.	Civil Action No. 9126	
사용하다 그 얼마 농계를 하는 것 같습니다.		, w
C. P. FORREST		
		,19
Defendant		
o Any Sheriff or any person authorized by Rule 4(a	a) (3) of the Alabama Rules of Civil	Procedure to effect ser
the State of Alahama.	(Tatorrogato)	ries
You are hereby commanded to serve this s		
C P Forrest 127 Piper	idge Road, Fairhope, Alaba	na <u> </u>
lefendant <u>C. P. Forrest, 127 Fine</u> Phone: 6	26 - 11 2 9	
	Interrogat	
Each defendant is required to serve a cop	y of a written answer toxkie to the	20 P. XUPOTI
Owen & Ball , Attor	rney of record for the plaintiff whose	e address is

410 Courthouse Square, Bay Minette, Alabama 36507 thirty (30) days after service of this summons excluding the day of service of the summons and to file the original of said written answer with the Clerk of this Court at the time of service of the answer upon the attorney of record for the Plaintiff or within a reasonable time thereafter. If any defendant fails to do so, a judgment by default may be entered against that defendant for the relief complained of in the complaint.

Dated December 5, 1975

Clerk of Circuit Court

INTERROGATORIES 9126 Civil Action No.	
THE STATE OF ALABAMA Baldwin County	C. P. Forrest, 127 Pineridge Road,
CIRCUIT COURT	Fairhope, Alabama Phone: 626-1129
KAISER AGRICULTUAL CHEMICALS, Division	
of Kalser Aluminum & Chemical Sales, a Corporation	and the second s
Plaintiffs Vs.	this / the day of file 1976 by leaving a copy with
C. P. FORREST	O. P. Jarrest
Defendants	
SUMMONS	
Filed December 5	This is to certify that the
EUNICE B. BLACKMON , Clerk	return on the above named
	Momas of Gules
	OLENK CIVIL DIVISION
	THY COMMISSION EXPIRES JULY 24, 197
OWEN & BALL, BY:: JAMES R. OWEN Plaintiff's Attorney	Sheriff
Defendant's Attorney	Com Deputy Sheriff
Detendant's Attorney	MOORE Prig. Co., Bay Minetie
	W Williams
de la companya de la	A SHERRY

ΛL

STATE OF ALABAMA)
**
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. P. Forrest 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, Inc.

WITNESS my hand this 12 day of February, 1970.

Olice Juck

Defendant resides in Fairhope.

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

Plaintiff,

VS.

C. P. FORREST,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW 9/26

Defendant.

COMPLAINT

COUNT ONE

Plaintiff claims of the defendant Four Thousand Seven
Hundred Fifty-six and 05/100 Dollars (\$4,756.05) due from him by
account on the 22nd day of February, 1967, which sum of money, with
the interest thereon, is still unpaid.

Attorney for Plaintiff

FEB 1 5 kgg

ALIGE J. BUSIN REGISTER

VOL 64 PAGE 526

242-19-70

Kaiser Agricultural. Chemicals Plb us. C. P. Forrest

JAMES R. OWEN ATTORNEY AT LAW 110 COURTHOUSE SQUARE BAY MINETTE, ALABAMA 36507

June 8, 1973

P. O. BOX 248 TEL 937-2061 AREA CODE 205

Eunice Blackmon Clerk Bay Minette, Alabama

Dear Eunice:

Please return the notice for request for assets in the case of Kaiser vs. C. P. Forrest (Case No. 9126) to the Sheriff's Office with the request that they attempt service on the defendant once more.

I am writing the Sheriff, advising of an address which I have for Mr. Forrest.

Yours very truly,

JAMES R. OWEN

JRO/ers

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

Plaintiff,

VS.

C. P. FORREST,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9126

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 Five Thousand Six Hundred Two and no/100 Dollars (\$5,602.00) and costs in the amount of \$33.50 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.

C. P. FORREST,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9126

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 Five Thousand Six Hundred Two and no/100 Dollars (\$5,602.00) and costs in the amount of \$33.50 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.

Atterney for Plaintiff

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum &)	IN THE CIRCUIT COURT O	F
Chemical Sales, Inc., a Corporation,)	BALDWIN COUNTY, ALABAM	A
VS:)	AT LAW CASE NO. 9126	
C. P. FORREST)		

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 C. P.
FORREST, AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS
NOTICE.

CLERK, CIRCUIT COURT

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 C. P. Forrest be and appear before the Court on the let day of Proceed., 1974, at 9:00 a.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 forthwith upon the said Defendant.

ORDERED on this the 12 day of December, 1974.

Jesfair A. Maseileere

Defendant may be served at:

127 Pineridge Road Lake Forest Daphne, Alabama

DECREE

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

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

ORDERED on this the 1th day of Morosuker, 1974.

Jeffers Mastelvery CIRPUIT JUDGE

Defendant may be served at:

127 Pineridge Road Lake Forest Daphne, Alabama KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & Chemical Sales, Inc., a corporation,

Plaintiff,

VS.

C. P. FORREST,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9126

Defendant.

NOTICE

TO: C. P. Forrest

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.

Guniel B. Blackman

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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

Gruice B. Blackmon

127 PINERIDGE

#9126

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

C. P. FORREST

Notice of Discovery of Assets

RECEIVED FILED JUN 1 2 1978

JAN 15 1973

TAYLOR WILKINS

EUNICE B. BLACKMON ENCEIVED

JAN 1 6 1978

TAYLOR WILKINS

J. R. Owen,

n, Attorney for Plaintiff

127 PINERIAGE
LAKEFORDT

#9126

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

C. P. FORREST

RECEIVED JUN 1 21973

TAYLOR WILKINS

EUNICE B. BLACKMON ENTICEIVED

JAN 1 6 1973

TAYLOR WILKINS

J. R. Owen,

Attorney for Plaintiff

Notice of Discovery of Assets

FILED

JAN 15 1973

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum &	Ø Ø		
Chemical Sales, Inc., a Corporation,	Ĭ		
Plaintiff,	Ĭ	CASE NO.	9126
VS.	Ĭ		
C. P. FORREST,	Ĭ		
Defendant.	Ĭ		

INTERROGATORIES

Now comes the Plaintiff and propounds the following interrogatories to the Defendant, C. P. Forrest:

- 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 the 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-tenants?
- 13. If so, give their names and the amount or 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?

-3-30. 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, 32. 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. Have you the right of access to any safe deposit If so, give the details. box? 35. Have you any accident, health or life insurance? If so, answer the following questions: 36. The name of the company. Α. Each policy number. В. The amount, type and date of issuance of each life insurance policy. C. D. The name and address of beneficiary of each life insurance policy. Ε. The date and particulars of any change of beneficiary. \mathbb{F} . The particulars of any assignment or assignments of life insurance policy. The dates and amounts of any loan against such policies. 37. If you have borrowed on any life insurance policy, what did you do with the money? 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 40. 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. 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 interst in any of the following:
 - A. Real Estate.
 - B. Stocks, bonds or other securities.
 - C. Mortgages on real property or personal property.
 - D. Promissory notes, drafts, bills of exchange or other commercial paper.
 - E. Judgments.
 - F. Jewelry or antiques.
 - G. Stamp collections or coin collections.
 - H. Savings bonds.
 - I. Automobile or truck.
 - J. Patents, inventions, trademarks or copyrights.
 - K. Joint ventures or other business enterprises.
 - L. 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.
- 46. If any of such property is mortgaged, pledged, encumbered or subject to 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.

-5-

- 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 firm?
- 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?
- 65. Within the past year, have you received any payment 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 full 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.
- 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 liabilities, exclusive of this judgment, and what are the names and address of your creditors?
- 80. When and for what purposes were these liabilities incurred?

BY: <

OWEN AND BALL

A Care Canada

DEC 5 1975

Attorneys for Plaintiff 410 Courthouse Square Bay Minette, Alabama 36507

EUNICE B. BLACKMON CIRCUIT

¥\$ ◆	12 day of Dec. 1974
	do, do
3 =	and on day of 19
Shortf	I served a copy of the within fluch
	on C.P. torrest
KINS, SHERIFF	
	By service on
. 0	
D. C.	TAYLOR WILKINS, Sheriff
	ByD. \$
g -	

Egge

RECEIVED

DEC 1 2 1974
TAYLOR WILKINS
SHERIFF

Not found in
Time for
DATE NEWS
New DATE
12-20-74
AMENNE

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 C. P. Forrest be and appear before the Court on the part day of Morecular, 1974, at 9:00 a.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 forthwith upon the said Defendant.

ORDERED on this the the day of Monseules, 1974.

Jeffer A. Madleberre

Defendant may be served at:

127 Pineridge Road Lake Forest Daphne, Alabama

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 C. P. Forrest be and appear before the Court on the said of 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 forthwith upon the said Defendant.

ORDERED on this the 12th day of December, 1974.

Jeffer 4 marlebeure

Defendant may be served at:

127 Pineridge Road Lake Forest Daphne, Alabama

KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum &		IN THE CIRCUIT COURT OF
Chemical Sales, Inc., a Corporation,)	BALDWIN COUNTY, ALABAMA
VS:)	AT LAW CASE NO. 9126
C. P. FORREST)	

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 C. P.
FORREST, AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS
NOTICE.

CLERK, CIRCUIT COURT

RECEIVED

TAYLOR WILKINS SHERIFF NOV 6 1974

- INTINC

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

VS:

C. P. FORREST

Serve Deft: 127 Pineridge Road

EUNICE B. BLACKMON CHERK

Attorney for Plaintiff James R. Owen,

A September 19 Committee of the Sept

#9126

Daphne, Alabama Lake Forest

KAISER AGRICULTURAL CHEMICALS Division of Kaiser Aluminum &)	
	ation,) IN THE CIRCUIT COURT OF	
Plaintiff,) BALDWIN COUNTY, ALABAMA	
VS.) AT LAW NO. 9126	
C. P. FORREST,)	
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 Defendant on the 16th day of June, 1973; that the said defendant has willfully refused to file such statement.

The premises considered, Plaintiff petitions the Court that the said C. P. Forrest 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

STATE OF ALABAMA) **
BALDWIN COUNTY)

The second of the second

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 3/2/ day of October, 1974.

JAMES R. OWEN

The last last

OCT 31 1974

Notary Public, Baldwin County, Alabama

EUNICE B. BLACKMON CHACUIT

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 C. P. Forrest be and appear before the Court on the day of the 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 here.

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

ORDERED on this the 25th day of January, 1975.

Jefa A Masherey CIRCUIT JUDGE

Defendant may be served at:

127 Pineridge Road Lake Forest Daphne, Alabama

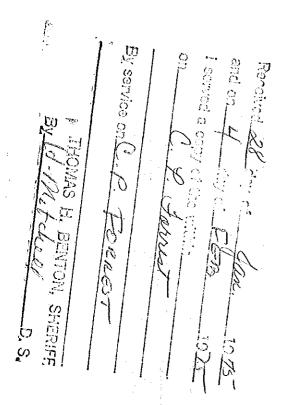
KAISER AGRICULTURAL CHEMICALS, Division of Kaiser Aluminum & Chemical Sales, Inc., a corporation,)	
)	IN THE CIRCUIT COURT OF
	Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW CASE NO. 9126
C. P. FORREST,)	
	Defendant.)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

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 C. P. FORREST, AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Jan-28, 1975

CLERK, CIRCUIT COURT



ieriff claimed 54 miles at in Cents per mile Total \$5.46 THOMAS H. BENTON, Sheriff

DEPUTY SHERIFF

THAT IL ESTITUTE OF DALDWIN

OF THE ALABANA, CLAHT \$1.50 EACH

PROCESS(ES) AND

THAVEL EXPENSE ON EACH OF \$ 5.40

PROCESS(ES) OR A TOTAL OF \$ 6.40

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

VS:

C. P. FORREST 127 Pineridge Road Lake Forest Daphne, Alabama

PETITION & DECREE

FILED

14N 28 1975

EUNICE B. BLACKMON CIRCUIT

GIBBONS, STOKES & CLARK

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA

TELEPHONE 433-1831

E. GRAHAM GIBBONS B. F. STOKES, III ROBERT F. CLARK GREGORY B. MCATEE

January 31, 1977

MAILING ADDRESS
P. O. DRAWER 889
MOBILE, ALABAMA 36601

Mrs. Eunice Blackmon Clerk, Circuit Court Baldwin County Courthouse Bay Minette, Alabama

> Re: Kaiser Agricultural Chemicals vs. C. P. Forrest Case No. 9126

Dear Sir:

Please enter my name as co-counsel for the plaintiff in the above styled case.

Sincerely,

GIBBONS, STOKES & CLARK

B J. SUKEN III

G. B. MCATEE For the Firm

GBM/sr

GIBBONS, STOKES & CLARK

ATTORNEYS AT LAW

160 CONGRESS STREET

MOBILE, ALABAMA

TELEPHONE 433-1831

E. GRAHAM GIBBONS B. F. STOKES, III ROBERT F. CLARK GREGORY B. MCATEE

February 24, 1977

MAILING ADDRESS
P. O. DRAWER 889
MOBILE, ALABAMA 36601

Mrs. Eunice B. Blackmon, Clerk Circuit Court Baldwin County Courthouse Bay Minette, Alabama

Re: Kaiser Agricultural Chemicals et al v. C. P. Forrest, Case No. 9126

Dear Mrs. Blackmon:

Enclosed please find Interrogatories to Defendant for filing in the above matter. I also enclose my check to cover the costs of filing.

Sincerely yours,

GIBBONS, STOKES & CLARK

B. F. Stokes, III

BFS:mi Encl.

cc: Hon. James R. Owen
Co-Counsel for Plaintiff

KAISER AGRICULTURAL CHEMICALS, Division of KAISER ALUMINUM & CHEMICAL SALES, INC., a corp.,)	
Plaintiff)	CIVIL ACTION
V.)	NO. 9126
C. P. FORREST,)	
Defendant)	

INTERROGATORIES TO THE DEFENDANT

Comes now the plaintiff and propounds the following interrogatories to the judgment debtor:

- Please state your name and address.
- 2. Please list any and all real estate owned by you, giving street address, if any, value of such property and a description of any mortgage or other lien against such real estate, giving the name of the mortgage holder, amount due, etc.
- 3. Please list any motor vehicles owned by you, giving a description of each and mortgage indebtedness or other lien against such motor vehicles.
- 4. Please state, or otherwise list, all personal property owned by you.
- 5. Please state the balance due in any and all checking or savings accounts maintained by you, also giving the name and address of such banks, or other financial instition.
- 6. Please state whether any person or firm owes you any money and if so, give full particulars.
 - 7. Please state the name and address of your employer.

ELED

GIBBONS, STOKES & CLARK

MAR 8 1977

EUNICE B. BLACKMON CIRCUIT

ROBERT F. CLARK P.O. Drawer 889 Mobile, Alabama

Serve the defendant:

127 Pineridge Road, Lake Forest, Daphne, Alabama.

		HEMICALS, DIVIS	SION , INC <i>Circuit Cou</i> i	rt. Baldınin	Countu A	l labama
A CORP. C. P. FORREST	Vs.	Plaintiff	Civil Action No	ŕ		 St
		:	-	Marc	h 9,	1977
	77. 76. 24.	Defendant				:
to effect service in You are	the State hereby c	of Alabama: ommanded to serv	Rule 4 (a) (3) of the re this summons and a ineridge Road, La	copy of the co	n <i>tenog</i> mplain t in t	atorieo his action
4.0 (1.0 Mark 2.0 (1.0 Mark 2.0 (1.0 Mark)			:	:		
Robert F. Clar	:k		a copy of a written , attorney of record	for the plain	iff whose a	address is
of this summons en answer with the Co for the Plaintiff of	xcluding t lerk of the r within	he day of service is Court at the time a reasonable time	of the summons and ne of service of the as thereafter. If any cendant for the relief	to file the orig inswer upon the lefendant fails t	ginal of said attorney of do so, a in the com	d written of record judgment

INTERROGATORIES TO THE DEFENDANT Civil Action No..... Defendant lives at STATE OF ALABAMA Baldwin County 127 Pineridge Road, Lake Forest Circuit Court MAR 10 1977 KAISER AGRICULTURAL CHEMICALS, DIV. OF KAISER. ALUMINUM & CHEMICAL SALES, INC. THOMAS US DENIUM ... Sheriff Plaintiffs I have executed this summons by leaving a copy with C. G. Forrest Defendants **SUMMONS** Eunice B. Blackmon Clerk Robert F. Clark Thomas Benton Sheriff Plaintiff's Attorney 14 7 14 all Deputy Sheriff Defendant's Attorney

Copy Soul To Janus Divlore

MAR 5 1976

EUNICE B. BLACKMON CINCUIT

1 minutes	
SUMMONS Interrogatories	Moore Prts Bay Minette
KAISER AGRICULTURAL CHEMICALS, D	<u>livisi</u> on
of Kaiser Aluminum & Chemical So	les, CIRCUIT.COURT of BALDWIN COUNTY, ALABAMA
Inc., a Corporation Plais Vs.	Civil Action No. 9126
C. P. FORREST	
Defend	
defendantC. P. Forrest, 127 Pi	/Interrogatories his summons and a copy of the complaint of the copy of the complaint of the copy of t
	Interrogatories
Each defendant is required to serve a	copy of a written answer to the complaint apon
Owen & Ball	Attorney of record for the plaintiff whose address is
410 Courthouse Square, Bay Minett	e, Alabama 36507 within
	excluding the day of service of the summons and to file the orig- this Court at the time of service of the answer upon the attorney
of record for the Plaintiff or within a reasona	able time thereafter. If any defendant fails to do so, a judgment
by default may be entered against that defends	ant for the relief complained of in the complaint.
Dated December 5, 1975	Einice B. Blackmon
ā ·	Clerk of Circuit Court

Marks F. Tamel 127 Pine Rudge FD. Dophne, ala. 11-27-23 3 Private house 4 20 7- Fuller Bro. Affikmisk Fort, Ola. 8- 416000 Per mo-9 - Helene FORREST Both 11 - YES 12 - no 14 - all hills are Paid by Helene Force. Darken. 1,5. year Helene Hathlock of 16. Vær Bill Forrest Dallo, Topok Dan. Forrest, Popketirulle, Miss Et. Forrest fr. Mohile, ola

17. Lalesman 18 a ges World Sporting Hoods Inc.
Mohilo, ala, 20. To Controct - Salary 2000 Herwood for with 20. My Wife works for dettle Review Com. actorism and Marken. in Raphne. I don't know rubot she Makes - all my Children are grown and have their dun family, I don't prow what they make. 22. noverest my wife it Varios as 23. lam a strep holder in world grottight all my stock which I still own for is in exgro at the 1st not Back of Mille and is asigned to Harry m. Smith with the South mitil all outstanding loon are Pard It is hapefull that these will De Love by 1981- The Par Value July Stock in 1400 00 24. Istocheen a solesman for World Sporting Goods the Prest 5 1/2.

26. no. 272 mo 29. yes world sporting Goods with Horse 5-milh-30. yes - 1st not Bank of Fairhope, Baphue Branch, Less than 1000 she said 31. Har salary 32. yes - Baldwan Nat. Bonb at Fairhipe The next herribbeen paid in Zyra. 33. Baldwin not. Fankops 34. I supple I would have the right of The box rent woo paid. The only thing is the hop rent woo paid where my thinks it is a Comatery lot Deed where my thinks 35 Have an accolably policy with SAINA.

Them is trooper was is furnica-36. my wife flat the policy on she is the herafice the is out of town at this time but I will The glid tis sind you the policy to Ho you need it. It has no Cost Volule -37. mo

40 + yes - 79000 on all Contents. Al Maria CF+ Helone L. Forest HI. My wife has then love -42- gen-a Co. Can that I love -42- A B C D E F A H no Tomy Wife has a Car financed with AMC I my Wife has a Car financed with AMC J. Klane 2 Palents on football equipment that are Townly owned by world sporting toods and world Aportgoods has all right with the popular KI no. Home -45. -42 HG. more 47. no-43 a no " 49. -50, noyear Internal Row. They have our 7000m Leans since 1969 52. no 53, 54. ، کرک 56. year, Expus inclosed -571 S-55 4

and 17500 for the Post Two your Man Checked me every year to betermine what I can possioly pay. That have a Tay lean for 1969 for our 7000 to. They checked me Inst two weeks ago, and hearthwye my payment . The State also has a \$170000 lean 60 no 61 mo 62 new 64 none except my Travel sup -65 no 67 mo 69 - 10 Telemen 1000 - 4/12000 my wifet me -71- year I am inclosing 1973 IRS has mylops of 74 and I brand dance 75 yet. 72 year Elks \$3500 per yr. 76 year land but I don't to it I can help it -78 -79-66,434,67+

17,420 James L. Farrist Wales Topas mote-Mary forrows 1967-68-69-862.00 Griffin Landard To Fairfore. 700.00 EM. Baily Legal feest Louise. gaer 7000,00 IRS quier 1700,00 State of da -De Most of this was for hassmen in

Januar 1

The State of Alabama, CIRCUIT COURT Term. 19.......

CERTIFICATE OF JUDGMENT

SOUTHERN PIPE & SUPPLY COMPANY OF MISS, INC.

and for the sum of (\$23.50) Twenty-three & 50/100-

the costs in said suit, and that E. G. Rickarby

Baldwin County

emy 18 sec 828

Moore Printing Co. - Bay Minette, Ala

are the Attorneys of record for the Plaintiff

ERTIFICATE OF JUDGMEN	T	Moore Printing Company, Bay Minette, Alebame
STATE OF ALABA Baldwin County	MA) CIRCUIT COURT	Term, 19
KLUMPP MOTOR COMPANY, INC	A CORP.	·
,	Plaintiff	
CASE NO. 8653	V3.	
		STATE OF ALABAMA, BALDWIN COURSY
CHARLES P. FORREST, Ind.	& FORREST INDUSTRIES,	I county those when Destrument was \$100d on
		MAY 29 1969 SEXEM
INC., A CORP.	Defendant	ord that no has was collected. Becaused to say Book 101 of hung Daline Judge of Probates
i	uck Clerk	of the Circuit Court of Baldwin County.
Alabama, do hereby certify on t	he loth day of	May 1969
		re. wherein Klumpp Motor Co.,
Inc., a Corp.		
was Plaintiff and Charles P.	Forrest, Ind. & Forress	t Industries, Inc., a corp.
		e sum of(\$276.86)
Two Hundred Seventy six.	and 86/100	DOLLARS
	are	e the Attorneys of record for the Plaintiff
in said cause.		×*

Witness my hand this 21st day of May 19.69

CERTIFICATE OF JUDGMENT	Moore Printing Co Bay Minette, Ala.
The State of Alabama, CIRCUIT COURT	Term, 19
APID FASTENER CORP., A CORP.	
	· .
Plaintiff	
Vo. # 93	274
CHARLES P. FORREST, Ind. & d/b/a FORREST	STATE OF ALABAMA, BALDWIN COUNTY I certify that this tristrument was till
ominable is a visible of a little of the both of the b	SEP 28 1970 &
INDUSTRIES Defendant	and that no tax was collected. Reco
	Py Roger JLD
I, Alice J. Duck Clerk o	of the Circuit Court of Baldwin County.
Alabama, do hereby certify on the 27 day of Aug	
a judgment was rendered by said Court in the above stated cause	, wherein
Rapid Fastener Corp., a corp.	
was Plaintiff and Charles P. Forrest, Ind. & d.	
***************************************	was Defendant, in
favor of the said Plaintiff and against the said Defendant for the	of (\$306.13)
Three Hundred Six & 13/100	
(#22 50) Maranta time 6 50/2/	20

the costs in said suit, and that E. G. Rickarby

1

One Thousand Seven Hundred Eighty-three and no/100 ---- DOLLARS

and for the sum of (\$34.50) Thirty-four and 50/100 - - - DOLLARS

the cos s in said suit, and that ... Hand... Arendall. Bedsole. Greaves & Johnston

Witness my hand this 15th day of October 19 69

in said cause.

are the Attorneys of record for the Plaintiff

18 2: 81 NO.8

Comprehensive Anna Comprehensive Comprehensi

······································			
	CIRCUIT COURT		
Baldwin County		·	
KAISER AGRICULTURAL CHEMICAL	LSDivision.of.Kaiser		
Aluminum & Chamical Sales, 1	Inc., a corp.		
Casa No. 9126	Va.	STATE OF ALABAMA, BALDWIN COUNTY I corrify that this instrument was filed on	
		MAR 24 1970 430 A	
C. P. FORREST		and that no tax was collected. Recorded by the Book 1. Thury D'aline. Pages 3 9 Proppies Judge of Proppies	PAN
***************************************	Defendant		100
			8 20 53
-		the Circuit Court of Baldwin County.	€
	•	Kaiser Agricultural Chemica	als
		wherein Kaiser Agricultural Chemica	
_	•	A.COIP	
was Plaintiff and	5	***************************************	
***************************************		was Defendant, in	
favor of the said Plaintiff and again	st the said Defendant for the su	m of (\$5602,00)	
Five Thousand Six Hundred T	wo and no/100	DOLLARS	
		DOLLARS,	
the costs in said suit, and that	ames R. Owen	·*************************************	
***************************************	are th	e Attorneys of record for the Plaintiff	
in said cause.			
Witness my hand this	Grd day of March	1970	

Clork, Circuit Court, Baldwin County, Alabama

in said cause.

CERTIFICATE OF JUDG	MENI	Moore Printing Co Bay Minette, Ala.	
The State of Alabama,	CIRCUIT COURT	Term, 19	
BEDSOLE TRADING COMPANY, INC	C., A CORP., d/b/a		
BEDSOLES OF FAIRHOPE			
***************************************	Plaintiff		
	s mantillane		
	Vs.	STATE OF ALABAMA, BALDWIN COUNTY	
		I certify that this instrument was filed and the following tox collected on	
,	•	01	
CHARLES P. FOREST		9CT 1 91970 2/TM	,
#*************************************		Recorded in Second	dy
		Property D'aline	
***************************************	Defendant	By	
			MUL
			*
			<u></u>
IAlice J. Duck	Clerk o	of the Circuit Court of Baldwin County,	18 mg 861
Alabama, do hereby certify on the	9 day of Februa	ry 19.70	ž.
a indoment was readered by said Court	1-1-1		33
a judgment was rendered by said Court		••	,—
Bedsole Trading Company, Inc	., A Corp., d/b/a Be	dsoles of Fairhope	
was Plaintiff and			
Charles D. H			
Charles P. Forest	***************************************	was Defendant, in	
favor of the said Plaintiff and against the	ne said Defendant for the t	sum of(\$191.87)	
One Hundred Ninety-one & 87	/100		
and for the sum of (\$23.50) Twenty	-three & 50/100	DOLLARS,	
the costs in said suit, and that John	V. Duck		•

are the Attorneys of record for the Plaintiff

in said cause.

Witness my hand this...... 15th day of October

STATE OF ALABAMA Baldwin County	CIRCUIT COURT	
FILM PROCESSORS, A Partnership	composed of	factor price
HBMcCLAIM.A.BSHAVARD.	Plaintíff	
CASE NO. 8272	Ye.	STATE OF ALABAMA, SALDWIN COUNTY I county that this treatment was filed on
C. P. FORREST. d/b/A FORREST.	Industries:	NOV 5 1969 8Am
C. P. FORREST & JOHN DOE, Co.	-partners.at.al Defendant	Judy book 333 Story D'aline Resolute Signature
IAlicaIDuck		f the Circuit Court of Baldwin County.
n judgment was rendered by said Court i	in the above stated cause	wherein Film Processors.
a Partnership composed of Ha Ba	McClaim.&.B.SHava	zd
was Plaintiff and	.d/b/sForrestIndua	tries;CPForrest&.John
Doe, co-partners et al	***************************************	was Defendant, in
favor of the said Plaintiff and against the	said Defendant for the s	um of(\$1.835.00)
One Thousand Eight Hundred Thire	y-five and no/100 -	DOLLARS
and for the sum of (\$64.30) Sixty-f	Tour and 30/100	
the costs in said suit, and that RANN RA	:ock.&.Nazwell.ECo	
Bedsole, Greaves & Johnston	470 th	e Attorneys of record for the Plaintiff

8.5.2 Sy xxxa