

CREDIT

Credit

BLACH'S
FAIR AND SQUARE
MOBILE, ALABAMA

041486

603247

476 880 122

EDUARDO JOHNSON

603247

BLACH'S
FAIR AND SQUARE
TELEPHONE 322-3551

Dec 1967

MR. EDUARDO JOHNSON
125 CONFEDERATE DR
SP. FRONT 4036227

ACCOUNT NUMBER
40929408
CLOSING DATE
12/12/67
TRANSACTIONS AFTER THIS
DATE WILL APPEAR NEXT
MONTH

OLD BALANCE	PURCHASES	CREDITS	PAID	SERVICE CHARGE	NEW BALANCE
1,049.70	86.92	59.12	.00	.00	1,081.50

603072

476 880 122

EDUARDO JOHNSON

603072

BLACH'S
FAIR AND SQUARE

TELEPHONE 222-3511

March 1968

STATEMENT

ACCOUNT NUMBER
40929408

CLOSING DATE
3/12/68

TRANSACTIONS AFTER THIS
DATE WILL APPEAR NEXT
MONTH

OLD BALANCE	PURCHASES	DEBIT	PAID	SERVICE CHARGE
1,061.88	.00	50.00	50.00	15.47

NEW BALANCE
1,061.88

CHANGE OF ADDRESS

Mr. Eduardo Johnson

PLEASE ENCLOSE THIS CARD WITH YOUR REMITTANCE

DATE PAID *3/5/68* AMOUNT PAID \$ *50.00*

BLACH'S
FAIR AND SQUARE
BIRMINGHAM, ALABAMA 35203

PAYMENT CARD

40929408

50.00

J. BLACH & SONS, INC.,)	IN THE CIRCUIT COURT OF
a Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	AT LAW
vs.)	
)	
MR. EDUARDO JOHNSON and)	
MRS. EDUARDO JOHNSON,)	
Jointly and Individually,)	
)	
Defendants.)	CASE NO. 9157

MOTION


COMES NOW the Plaintiff in the above styled matter and shows unto this Court as follows:

1. That Judgment was had in the above styled matter on March 10, 1971, in the amount of ONE THOUSAND THREE HUNDRED FIVE AND 12/100 (\$1,305.12) DOLLARS.

2. That a Writ of Discovery was served on the Defendant, Mrs. Edwardo Johnson, on August 25, 1971.

3. That more than thirty (30) days have passed since service of said Writ of Discovery and no answer has been filed by said Defendant, Mrs. Edwardo Johnson.

WHEREFORE, THE PREMISES CONSIDERED, the Plaintiff moves this Honorable Court for a RULE NISI.


J. GLENN COBB, JR.
Attorney for Plaintiff

Defendant, Mrs. Edwardo Johnson, may be served at:

Daphne, Alabama

FILED

DEC 27 1971

EUNICE B. BLACKMON CIRCUIT CLERK

J. BLACH & SONS, INC.,
a Corporation,

Plaintiff,

vs.

MR. EDUARDO JOHNSON and
MRS. EDUARDO JOHNSON,
Jointly and Individually,

Defendants.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW

) CASE NO. 9157

ORDER

This day in open Court came the Plaintiff by its Attorney,
and on motion of Plaintiff filed December 27, 1971; It is ordered
and adjudged by the Court that the Defendant, Mrs. Edwardo Johnson,
be, and she is hereby ordered to appear in Court at 9:30 A.M., on
January 13, 1972 and show cause, if any she has, why she should
not be adjudged in contempt of Court for her failure to answer the
Writ of Discovery served upon her in this cause.

Done this 27th day of December, 1971.

J. A. Maddison
CIRCUIT JUDGE

FILED

DEC 27 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

RECEIVED BY TAYLOR WILKINS SHERIFF

DEC 28 1971

FILED

9157

J. Black + Sons & Inc.

vs.

Mrs. Edwards Johnson
Uaphne DAPHNE, ALA

Motion
Rule to Show Cause

DEC 28 1971

TAYLOR WILKINS
SHERIFF

Received 28 day of Dec 1971
and on 20 day of Dec 1971
I served a copy of the within Motion + Rule to Show Cause
on Mrs Edwards Johnson
By service on Mrs Edwards Johnson

TAYLOR WILKINS, Sheriff
By [Signature] D.S.

Don Cente per mile Total \$ 11.00
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

J. BLACH & SONS, INC., A CORPORATION

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

MR. EDUARDO JOHNSON AND
MRS. EDUARDO JOHNSON, Jointly & Individually

Defendant

AT LAW, CASE NO. 9157

NOTICE TO DEFENDANT

TO:

Take notice that upon the written request of J. Glenn Cobb, Jr., Attorney for the Plaintiff, filed in this Court in this cause, you are commanded to file in this Court within thirty days from the service of this notice a statement in writing, under oath, of employment, wages and assets, including money, choses in action, notes, bonds and accounts and all other property, real, personal or mixed or any interest therein, including wages due or payable, with a detailed description of same, the location and reasonable value of each item thereof, together with a detailed list or statement of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

Dated this 23rd day of August, 19 71.

Ernie B. Blackman
Clerk of Circuit Court of
Baldwin County, Alabama.

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

COUNTY OF BALDWIN

BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA --GREETING:

YOU ARE HEREBY COMMANDED to serve a copy of the above notice upon Mr. Eduardo Johnson & Mrs. Eduardo Johnson Defendant, and make due return thereon, according to law.

Witness my hand this the 23rd day of August, 19 71.

Ernie B. Blackman
Clerk, Circuit Court of
Baldwin County, Alabama

NOTICE OF DISCOVERY OF ASSETS

J. BLACH & SONS, INC., A CORPORATION

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

MR. EDUARDO JOHNSON AND
MRS. EDUARDO JOHNSON, Jointly & Individually

Defendant

AT LAW, CASE NO. 9157

NOTICE TO DEFENDANT

TO:

Take notice that upon the written request of J. Glenn Cobb, Jr.,
Attorney for the Plaintiff, filed in this Court in this cause, you are commanded
to file in this Court within thirty days from the service of this notice a
statement in writing, under oath, of employment, wages and assets, including
money, choses in action, notes, bonds and accounts and all other property, real,
personal or mixed or any interest therein, including wages due or payable, with
a detailed description of same, the location and reasonable value of each item
thereof, together with a detailed list or statement of any and all liens,
mortgages or incumbrances thereon showing the amounts due upon each, and the
owner or holder of such liens, incumbrances or mortgages.

Be governed accordingly.

Dated this 23rd day of August, 19 71.

Ernie B. Blackmon
Clerk of Circuit Court of
Baldwin County, Alabama.

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

COUNTY OF BALDWIN

BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA --GREETING:

YOU ARE HEREBY COMMANDED to serve a copy of the above notice upon Mr. Eduardo
Johnson & Mrs. Eduardo Johnson Defendant, and make due return thereon, according
to law.

Witness my hand this the 23rd day of August, 19 71.

Ernie B. Blackmon
Clerk, Circuit Court of
Baldwin County, Alabama

9157

J. Black & Sons
Inc.

vs.

Mr & Mrs. Edwards Johnson

Daphne
Mobile

AUG 24 1971

received 24 day of Aug 19 71
and on 25th day of Aug 19 71
served a copy of the within

on Mr. Edwards Johnson

by service on Mr. Edwards Johnson

TAYLOR WILKINS, Sheriff

By Fred Seibert D. S.

Daphne

Mr. Edwards Johnson
NOT Found. Lives in Mobile
Co. Fred Seibert, D.S.

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

By Fred Seibert
DEPUTY SHERIFF

Returned 26 day of Aug 19 71


Not found in my county after dilligent search and In-
quiry.

Taylor Wilkins, Sheriff

By Fred Seibert
Deputy Sheriff

J. BLACH & SONS, INC.,)	IN THE CIRCUIT COURT OF
a Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	AT LAW
vs.)	
)	
MR. EDUARDO JOHNSON and)	
MRS. EDUARDO JOHNSON,)	
Jointly and Individually,)	
)	
Defendants.)	CASE NO. 9157

Comes now the Plaintiff in the above styled cause and respectfully moves the Court to issue to the Defendants herein a Writ of Discovery.


 J. GLENN COBB, JR.
 Attorney for Plaintiff

FILED

AUG 23 1971

EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mr. Edwardo Johnson and Mrs. Edwardo Johnson
Jointly & Individually

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 Mr. Edwardo Johnson
and Mrs. Edwardo Johnson, Jointly & Individually ... Defendant.....

by J. Blach & Sons, Inc., a corp.

....., Plaintiff.....

Witness my hand this 5th day of March 19 70

Alice J. Duck Clerk

24 3-5-70

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No. 9157

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

J. BLACH & SONS, INC., A CORP.

Plaintiffs

vs.

MR. EDUARDO JOHNSON & MRS. EDUARDO
JOHNSON, Jointly & Ind. Defendants

SUMMONS AND COMPLAINT

Filed March 5, 1970

Alice J. Duck Clerk

J. Glenn Cobb, Jr.
P. O. Box 6164
Mobile, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

125 Confederate Dr.
Spanish Fort

Received In Office

MARCH 5 1970

Sheriff

I have executed this summons

this 9 March 1970

by leaving a copy with

Mr & Mrs. Eduardo
Johnson
served both

Sheriff claims 108 miles at 55

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Cobb
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Moore Printing Co., Bay Minette, Ala.

JOHNSON, ALA

AFFIDAVIT

STATE OF ALABAMA)

COUNTY OF JEFFERSON)

Before me, Clemma S. Mullins, a Notary Public,
in and for said State and County, personally appeared Aubrey P.
Glass, who, being duly sworn, states that he has personal
knowledge that the itemized account hereto attached against Mr. and
Mrs. Edwardo Johnson, amounting to a balance of \$ 1,125.12

_____ is true and correct and is
justly due BLACH'S CLOTHING STORE, after the allowance of all credits
to which the said Mr. and Mrs. Edwardo Johnson are entitled.

Aubrey P. Glass

SWORN TO AND SUBSCRIBED BEFORE ME
on this the 28 day of February,
1970.

Clemma S. Mullins
Notary Public for State of Alabama at Large
Term Expires 7-16-73

J. BLACH & SONS, INC., A
Corporation,

Plaintiff

vs.

MR. EDUARDO JOHNSON and
MRS. EDUARDO JOHNSON,
Jointly and Individually,


Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

CASE NO. 9157

III

Plaintiff claims of the Defendants the sum of
ONE THOUSAND ONE HUNDRED TWENTY-FIVE AND 12/100 (\$1,125.12)
DOLLARS, due by verified account from, to-wit: July 12, 1968,
which sum of money with interest thereon is due and unpaid and
said verified account is herewith attached and marked Exhibit
"A" and made a part hereof, as though fully set out herein.


J. GLENN COBB, JR.
Attorney for Plaintiff

Defendants may be served at:

125 Confederate Drive
Spanish Fort, Alabama

FILED

MAR 5 1970

ALICE J. DUCK CLERK
REGISTER

TAYLOR D. WILKINS, JR.

ATTORNEY AT LAW

TELEPHONE 937-7024 P. O. BOX 61

BAY MINETTE, ALABAMA 36507

October 16, 1970

Mrs. Alice J. Duck
Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama 36507

Attn: Mrs. Eunice Blackmon

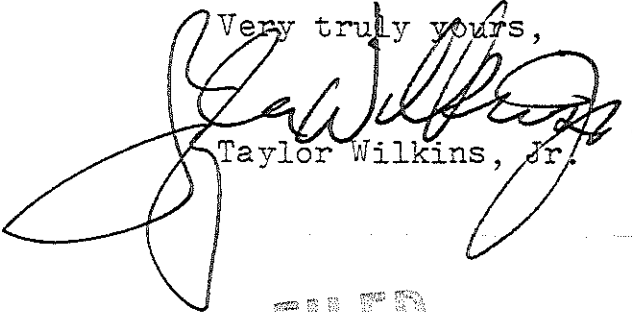
RE: J. Blach & Sons, Inc. 9157
vs
Mr. & Mrs. Eduardo Johnson
and
Edward A. Johnson
vs
Eduardo Johnson 8177

Dear Mrs. Duck:

Please be advised I no longer represent the Defendants in the above styled cases. I would appreciate you making the necessary notation on record.

Thanking you for your consideration, I am

Very truly yours,


Taylor Wilkins, Jr.

TWJr:sp

FILED

OCT 17, 1970

ALICE J. DUCK CLERK
REGISTER

J. BLACH & SONS, INC., A
corporation,

PLAINTIFF,

VS.

MR. EDUARDO JOHNSON and
MRS. EDUARDO JOHNSON,
jointly and individually,

DEFENDANTS.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

: AT LAW

: 9157

:

:

CASE NO:

:

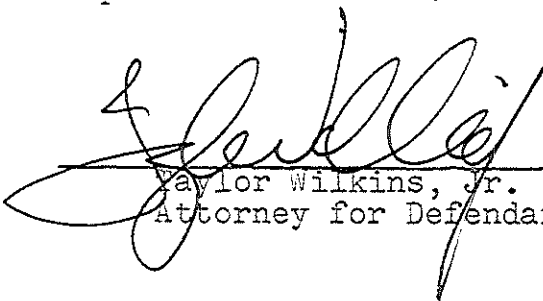
D E M U R R E R

Comes now the defendant, Mrs. Eduardo Johnson, in the above style cause and files a demurrer to the plaintiff's complaint, separately and severally to each and every count thereof and sets down and assigns the following grounds:

1. Sufficient facts are not alleged therein to state a cause of action against the defendant.

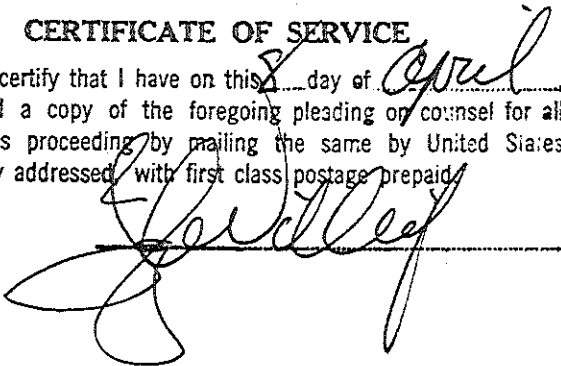
2. Sufficient facts are not alleged therein to state a claim upon which relief can be granted to the plaintiff for that Mrs. Eduardo Johnson does not have an account with the plaintiff nor is she shown to appear on the verified account as filed with the plaintiff's complaint.

3. From aught that appears from the plaintiff's complaint there is a misjoinder of parties defendant.


Taylor Wilkins, Jr.
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8 day of April
1970 served a copy of the foregoing pleading or counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.



FILED

APR 8 1970

ALICE J. E.

CLERK
MASTER

VOL

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9157

J. GLENN COBB, JR.

ATTORNEY AT LAW

2062 DAUPHIN STREET P. O. Box 6164

MOBILE, ALABAMA 36606

TELEPHONE 479-5436

March 23, 1972

Mrs. Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: J. Blach & Sons, Inc. v.
Mr. & Mrs. Edwardo Johnson
Case Number 9157

Dear Mrs. Blackmon:

I am in receipt of a notice that \$15.40 in court costs is due.
Please send me an itemized statement for this charge.

Yours,


J. GLENN COBB, JR.

sab

*Done
3-24-72*

J. GLENN COBB, JR.

ATTORNEY AT LAW

2062 DAUPHIN STREET P. O. Box 6164

MOBILE, ALABAMA 36606

TELEPHONE 479-5436

March 18, 1971

Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: J. Blach & Sons, Inc. v.
Mr. & Mrs. Eduardo Johnson
Case No. 9157

Gentlemen:

Please issue execution to the Sheriff of Baldwin County in
the above styled and numbered cause.

Yours,


J. GLENN COBB, JR.

sam