

March 17, 1970

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

Re: Gibson v. Parker

Dear Mrs. Duck:

Please file enclosed complaint as a matter of record
and acknowledge receipt and filing by signing enclosed
tissue copy of this letter.

Yours very truly,

A handwritten signature in cursive script, reading "Thomas G. Owens". The signature is written in dark ink and includes a stylized flourish at the end.

For the Firm

TGGIII.sp

FILED

MAR 18 1970

ALICE J. DUCK

CLERK
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

March 17, 1970

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAS
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARO HAND
VIVIAN G. JOHNSTON, JR.
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A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
THOMAS GUY GREAVES, III

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

Re: Gibson v. Parker

9168

Dear Mrs. Duck:

Please file enclosed complaint as a matter of record
and acknowledge receipt and filing by signing enclosed
tissue copy of this letter.

Yours very truly,

Thomas G. Greaves, III

For the Firm

TGGIII.sp

FILED

MAR 18 1970

ALICE J. DUCK CLERK
REGISTER

MARTIN VAN GIBSON, § IN THE CIRCUIT COURT OF
Plaintiff, § BALDWIN COUNTY, ALABAMA
vs. § AT LAW
HUBERT G. PARKER, §
Defendant. § CASE NO. 9168

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE THOUSAND (\$1,000.00) DOLLARS, as damages for that heretofore and on, to-wit; September 28, 1969, the Plaintiff was operating his motor vehicle on or upon Baldwin County Highway No. 47, a public road in Baldwin County, Alabama, at a point, to-wit, 9.3 miles north of the city limits of Bay Minette, Baldwin County, Alabama, and the Defendant so negligently operated his motor vehicle at the time and place aforesaid, as to cause or allow the same to collide with the Plaintiff's motor vehicle, and as a proximate result of the Defendant's negligence as aforesaid, the Plaintiff's automobile was broken, bent, smashed and damaged, hence this suit.



Thomas G. Greaves, III
Trial Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
30th Floor - First National Bank Building
Mobile, Alabama

Defendant may be served at:

1006 "B" Street
Bay Minette, Alabama 36507

FILED

MAR 1 8 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9168

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Hubert G. Parker

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.....

Hubert G. Parker .., Defendant.....

by Martin Van Gibson

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

Witness my hand this 18th day of March 1970

Alice J. Duck Clerk

24 3-26-70

10004B B St

No. 9168

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MARTIN VAN GIBSON

Plaintiffs

vs.

HUBERT G. PARKER

Defendants

SUMMONS AND COMPLAINT

Filed March 18, 1970

Alice J. Duck

Clerk

Hand, Arendall, Bedsole, Greaves
& Johnston

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Ala.

Received In Office

March 19, 1970

Sheriff

I have executed this summons

this March 26, 1970

by leaving a copy with

Hubert G. Parker

Taylor Welborn Sheriff

W. A. Talbert Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

MARTIN VAN GIBSON,

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

HUBERT G. PARKER,

Defendant

AT LAW, CASE NO. 9168

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: HUBERT G. PARKER

TAKE NOTICE, WHEREAS, THE PLAINTIFF HEREIN HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF THIS COURT, TO ISSUE NOTICE TO YOU AS DEFENDANT HEREIN, REQUIRING YOU TO FILE A STATEMENT, IN WRITING, UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN TITLE 7, SECTION 903, ALABAMA CODE 1940, AS AMENDED AND IT APPEARING FROM THE SAID REQUEST AND THE RECORD IN THE SAID CAUSE THAT AN EXECUTION WAS RETURNED ON THE JUDGEMENT IN THIS CAUSE ON THE 16TH DAY OF July, 19 71, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID HUBERT G. PARKER 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 INTEREST THEREIN WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED LIST OF STATEMENTS, OR ANY AND ALL LIENS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS THE 10th DAY OF December, 19 71.

Ernest B. Blackman
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED HUBERT G. PARKER AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernest B. Blackman
CLERK

Received 10 day of Dec 1971
and on 13 day of Dec 1971
I served a copy of the within discovery of assets
on Hubert G. Parker

By service on _____

TAYLOR WILKINS, Sheriff
By H. G. Parker

Sheriff claims 10 miles at
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY H. G. Parker
DEPUTY SHERIFF

CASE NO. 9168

MARTIN VAN GIBSON,

Plaintiff

vs:

HUBERT G. PARKER,

Defendant

Discovery of Assets

DEC 10 1971

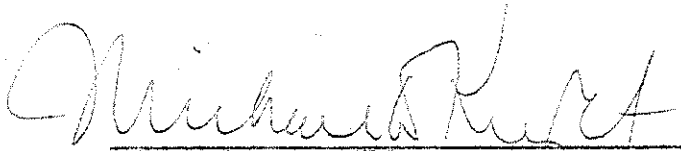
TAYLOR WILKINS
SHERIFF

Hand, Arendall, Bedsole,
Greaves & Johnston
P. O. Box 123- Mobile,

MARTIN VAN GIBSON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
HUBERT G. PARKER,)
Defendant.) CASE NO. 9168

N O T I C E

The plaintiff herein having recovered judgment on August 7, 1970, against the defendant in the above-styled cause for the sum of EIGHT HUNDRED ELEVEN AND 97/100 (\$811.97) DOLLARS, and costs in the sum of SEVENTEEN AND 25/100 (\$17.25) and such execution having been returned endorsed by the Sheriff of the County of Baldwin, State of Alabama "no property found", the plaintiff now requests in writing that the Clerk of this Court shall issue a notice to the above-named defendant requiring him within thirty (30) days of the service of such notice to file in this court a statement in writing under oath of all of his assets of every kind, character and description whatsoever located as provided by Code 1940, Title 7, Section 903.



MICHAEL D. KNIGHT
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at

1006 "B" Street
Bay Minette, Alabama

FILED

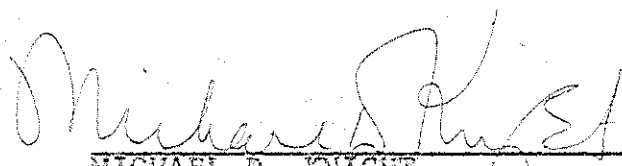
DEC 9 1971

EUNICE B. BLACKMON CIRCUIT CLERK

MARTIN VAN GIBSON,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
HUBERT G. PARKER,)	
Defendant.)	CASE NO. 9168

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MICHAEL D. KNIGHT
 Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

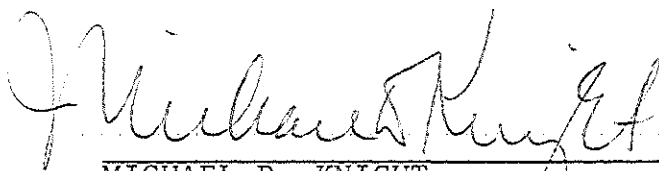
Defendant may be served at

1006 "B" Street
 Bay Minette, Alabama

MARTIN VAN GIBSON,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
HUBERT G. PARKER,)	
Defendant.)	CASE NO. 9168

N O T I C E

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MICHAEL D. KNIGHT
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at

1006 "B" Street
Bay Minette, Alabama

FILED

DEC 9 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

9168

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. S. ARENDALL, JR.
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MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

December 7, 1971

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

Re: Martin Van Gibson
v. Hubert G. Parker
Case No. 9168

Dear Mrs. Blackmon:

On July 1, 1971, I wrote asking that you issue a writ of execution against the defendant in this case to be returned "no property found" by the Sheriff's Office, since I knew of no specific property subject to levy and execution to satisfy this judgment. On November 17, 1971, my secretary called and asked about this file. She was advised that a letter was insufficient and that we must file an affidavit. I have enclosed a "Notice" form which I have used before in cases like this asking for this writ of discovery. While the notice reflects the writ of execution has been returned "no property found" I cannot state as a matter of fact that this has been done. If it has not, would you please issue a writ of execution and ask the Sheriff's Office to return it "no property found" and then file the notice which should be sufficient to require the defendant to file the statement in writing.

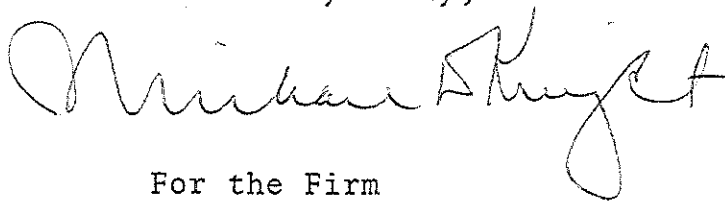
I know of no obligation to file an affidavit unless we are requesting an oral examination pursuant to Title 7, Section 904, Code of Alabama 1940 (Recomp. 1958) which I am not doing.

Please let me know if you have any questions.

Mrs. Eunice Blackmon
December 7, 1971
Page Two

Best regards.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Michael Knight". The signature is fluid and extends across the width of the line.

For the Firm

MDK.er

Dear Mrs Blackmon

I am writing in regards of your notice that was sent out to me by the sheriff to let you know that I have no assets, I do not own anything & nothing I have is paid for & what we do have I am paying for in my wife's name, I don't know what this guy means by trying to get judgment against me, when the accident in which we had was his fault to begin with, since we had the accident I have written the Gov. of Ala. I explained the situation to him & he wrote me back & said that it had went over a year & that I should write the Dept. of Pub. Safety & explained the situation to them & they would send me my drivers license back at which they did & that I wouldn't have to worry about the matter any further.

Yours truly

H. H. Parker

FILED

JAN 17 1972

EUNICE B. BLACKMON
CIRCUIT
CLERK