

IRBY AND POGGI
ATTORNEYS AT LAW
305 NORTH SECTION STREET
FAIRHOPE, ALABAMA 36532

SAMUEL W. IRBY
FRANCIS A. POGGI, JR.

MAILING ADDRESS
P O DRAWER B
TELEPHONE 926-6265
AREA CODE 205

February 1, 1973

Eunice B. Blackmon
P. O. Box 239
Bay Minette, Alabama 36507

Dear Eunice:

As you know, Dan Robison is no longer practicing law in this area. Please place Irby and Poggi as attorneys of record on the following cases that were turned over to us by Dan.

Dr. D. K. Cooper -vs- J. Wade	Case No. 10,156✓
Farmers & Merchants Bank -vs- Clifford McLain & Louise McLain	Case No. 10,366
Donald Gaar, d/b/a/ Foley Auto Parts -vs- Jaye Truck Lines, Inc.	Case No. 10,346
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Laura Williams	Case No. 10,348
Kenneth Totsch, d/b/a/ Totsch Boat Works -vs- Donald Forsyth	Case No. 10,132✓
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Ralph Dubuison	Case. No. 10,349
Baptist Hospital -vs- Fannie Mae Walden	Case No. 10,373✓
La Rue Flying Service, Inc. -vs- John R. Childress	Case No. 9,469✓

FILED

FEB 2 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

Eunice B. Blackmon
February 1, 1973
Page 2

Jerry Hance, d/b/a/ Magnolia Springs
Garage -vs- Rodney Carver

Case No. 10,346

George W. Markham, Sr. and Randall
Markham, d/b/a/ George Markham &
Sons Signs -vs- H. Rowland Clifton

Case No. 10,458

Foley Tractor Co., Inc -vs- Paul L.
Bonnell

Case No. 9,215 ✓

La Rue Flying Service -vs- Henry King

Case No. 9,615

~~Eddie Sweat -vs- John A. McDuffie~~

~~Case No. 9,455~~

If you have any questions concerning this matter, please do
not hesitate to call.

Yours very truly,

Sam W. Libby
For the Firm

SWI/akb

FILED

FEB 2 1973

EUNICE B. BLACKMON
CIRCUIT CLERK

MEMO-LETTER

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE

DATE May 19, 1970

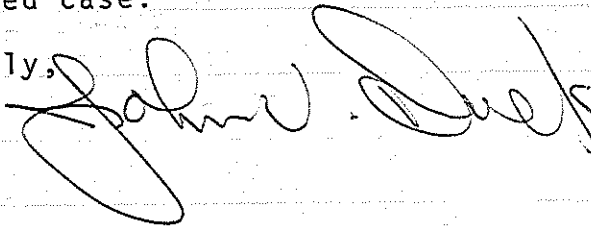
Re: Foley Tractor vs. Bonnell.

Civil Case No. 9215

Dear Mrs. Duck:

Enclosed please find Plea to be filed in
captioned case.

Sincerely,



SIGNED

SIGNED

STATE OF ALABAMA
BALDWIN COUNTY

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

You are hereby commanded to summon PAUL L. BONNELL, of Box 779, Bonnell Farms, Fairhope, Alabama, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of FOLEY TRACTOR CO., INC.

Witness my hand, this 18 day of April, 1970.

Alice J. Duck
Clerk of the Court

* * * * *

FOLEY TRACTOR CO., INC.)	
AN ALABAMA CORPORATION,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
v. -)	AT LAW
PAUL L. BONNELL,)	NO. <u>9215</u>
Defendant)	

COMPLAINT

The Plaintiff claims of the Defendant the sum of Two thousand Five hundred and Forty-nine and 75/100ths(\$2,549.75) Dollars as damages for breach of a conditional sales contract, executed on August 18, 1967, whereby Plaintiff agreed to deliver a Massey-Ferguson 300 Diesel combine with 13² header, cab, chopper, header-control, and Massey-Ferguson 222 Two-Row corn head attachment, to the Defendant and Defendant agreed to pay the purchase price. And although the Plaintiff has complied with all its provisions on its part, the Defendant has failed to pay the purchase price, and the amount due, after all credits, is \$2,299.75, ~~XX~~ and Plaintiff also asks for a reasonable attorney's fee for collection as provided in the contract, in the amount of \$250.00.

Daniel E. Robison
Daniel E. Robison
Plaintiff's Attorney

FILED

APR 15 1970

ALICE J. DUCK CLERK
REGISTER

* * * * *

9215

Foley Tractor Co. Inc.
An Als Corp -

vs.

Paul R. Donnell

FILED

APR 15 1970

ALICE J. DUCK CLERK
REGISTER

Received 15 day of April 1970
and on 20 day of April 1970
I served a copy of the within
on Paul R. Donnell

By service on Paul R. Donnell

TAYLOR WILKINS, Sheriff
By W. D. Smith D. S.

Sheriff claims 90 miles at
Ten Cents per mile Total \$ 9.00
BY W. D. Smith
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

70 miles
Fairhope, AL

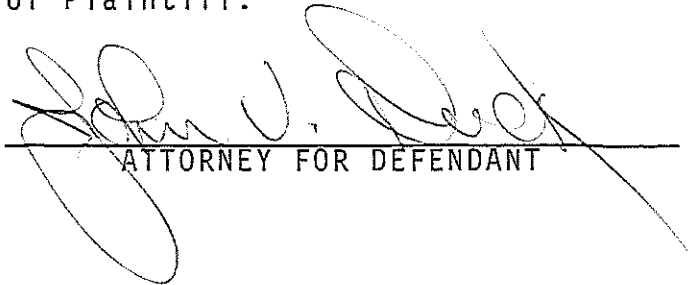
FOLEY TRACTOR CO., INC.,)
an Alabama Corporation,)
Plaintiff,)
vs.)
PAUL L. BONNELL,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 9215

DEMURRER

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and assigns as grounds thereof, the following separately and severally:

1. That said Bill of Complaint does not state a cause of action.
2. That said Bill of Complaint does not allege whether the said contract was oral or written .
3. That said Bill of Complaint does not allege that Defendant was in default on the payments under said contract.
4. That said Bill of Complaint fails to allege any credits due under said contract.
5. That said Bill of Complaint fails to allege that Defendant executed any contract in favor of Plaintiff.


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 28 day of April 1970

Attorney for

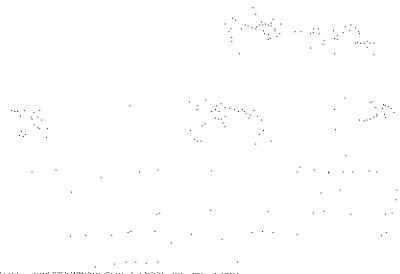
Defendant

FILED

APR 30 1970

ALICE J. DUCK

CLERK
REGISTER



9415

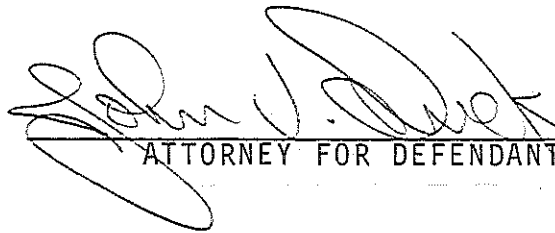
FOLEY TRACTOR CO., INC.,)
a corporation,)
Plaintiff,)
vs.)
PAUL L. BONNELL,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 9215

PLEA

Comes now the Defendant in the above styled cause, and
for plea to the Bill of Complaint filed herein, assigns the follow-
ing separately and severally:

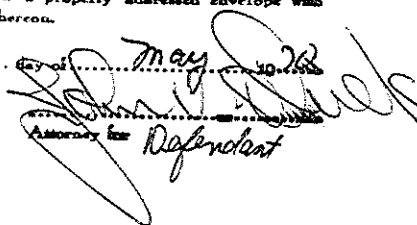
1. "Not guilty".
2. That the contract sued on was paid prior to the filing
of this suit.


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel
for the opposing party in the foregoing matter with a copy
of this pleading by depositing in the United States Mail
a copy of same in a properly addressed envelope with
adequate postage thereon.

This 19th day of May 1970


Attorney for Defendant

FILED
MAY 21 1970
ALICE J. DUCK
CLERK
REGISTER

<u>Foley Tractor Co., Inc.</u>)	IN THE CIRCUIT COURT OF
<u>An Alabama Corporation</u>)	BALDWIN COUNTY, ALABAMA
Plaintiff)	AT LAW
vs.)	NO. <u>9215</u>
<u>Paul L. Bonnell</u>)	
)	
Defendant)	

CREDITOR'S BILL

TO THE HONORABLE EUNICE BLACKMON, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Whereas, in the above entitled cause the Plaintiff recovered
a judgment against the said Defendant, in Case No. 9215, At Law,
on the 10th day of March, 1971 for the sum of Two Thousand
Five Hundred Forty-nine & 75/100 (\$2,549.75) Dollars,
besides the costs of said cause; and whereas, execution was issued
on said judgment against the said Paul L. Bonnell
on the 20 day of March, 1971, the said execution was
returned by the Sheriff of Baldwin County, Alabama, with the en-
dorsement thereon "No Property Found," and said judgment remains un-
paid and unsatisfied.

Now, therefore, this is to request you as Clerk of said Court
to issue a notice to said Paul L. Bonnell requiring him
to file in the Circuit Court, within thirty days from service of
notice, a statement in writing, under oath, of all the assets of the
said Paul L. Bonnell, including money, personal
and real property, choses in action, bonds and accounts, with a de-
tailed description of the same, the location and reasonable value
of each item thereof, together with a detailed statement of all liens,
mortgages or incumbrances thereon, showing the amounts due upon each,
and the owner or holder of such liens, mortgages or incumbrances.

Paul L. Bonnell lives at Box 779, Fairhope, Alabama

Dated this 22 day of November, 1971.

Daniel E. Robinson
Attorney for Plaintiff

FILED

NOV 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK

FOLEY TRACTOR CO, INC.,
Plaintiff

IN THE CIRCUIT COURT OF

vs:

BALDWIN COUNTY, ALABAMA

PAUL L. BONNELL

AT LAW, CASE NO. 9215

Defendant

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: PAUL L. BONNELL

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 29 DAY OF Nov., 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 Paul L. Bonnell 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 30 DAY OF Nov., 1971.

Ernie B. Blackburn
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED Paul L. Bonnell AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernie B. Blackburn
CLERK

Received 1 day of Dec. 19 71
and on day of 19
I served a copy of the within Writ
on Paul L. Bonnell

By service on

TAYLOR WILKINS, Sheriff

By D. S.

Sheriff claims miles at
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF
6 day of Dec. 19 71

Was found in my custody after diligent search and no
entry.

Taylor William Sheriff
Carlele Childers
Deputy Sheriff

9215

Joley Tractor Co

vs.

Paul L. Bonnell

Writ

DEC 1 1971
SHERIFF

Daniel E. Robinson
A+H

FOLEY TRACTOR CO, INC.,
Plaintiff

IN THE CIRCUIT COURT OF

vs:

BALDWIN COUNTY, ALABAMA

PAUL L. BONNELL

AT LAW, CASE NO. 9215

Defendant

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: PAUL L. BONNELL

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 _____ DAY OF _____, 1971, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID Paul L. Bonnell 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, CHOSES 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 30 DAY OF Nov., 1971.

Ernie B. Blackman
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED Paul L. Bonnell AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernie B. Blackman
CLERK

FOLEY TRACTOR CO., INC.,
an Alabama Corporation,

Plaintiff

vs.

PAUL L. BONNELL,

Defendant

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

§

AT LAW

§

§

CASE NO. 9215

REQUEST FOR WRIT OF DISCOVERY

TO THE HONORABLE EUNICE BLACKMON, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Whereas, in the above entitled cause the Plaintiff recovered a judgment against the said Defendant, in Case No. 9215, at law, on the 10th day of March, 1971, for the sum of TWO THOUSAND FIVE HUNDRED FORTY-NINE AND 75/100 (\$2,549.75) DOLLARS, besides the costs of said cause; and whereas, execution was issued on said judgment against the said Paul L. Bonnell on the 20th day of March, 1971, the said execution was returned by the Sheriff of Baldwin County, Alabama, with the endorsement thereon "No Property Found," and said judgment remains unpaid and unsatisfied.

Now, therefore, this is to request you as Clerk of said Court to issue a notice to said Paul L. Bonnell requiring him to file in the Circuit Court, within thirty (30) days from service of notice, a statement in writing, under oath, of all the assets of the said Paul L. Bonnell, including money, personal and real property, choses in action, bonds and documents, with a detailed description of the same, place of employment, contracts for the growth and sell of crops, with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of all liens, mortgages or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Dated this 14 day of November, 1972.


DANIEL E. ROBISON

Defendant Paul L. Bonnell lives at Daphne, Alabama just east of the
Rosemont Nursing Home. His phone number is 928-9678.

FILED
NOV 17 1972
EUNICE B. BLACKMON
CIRCUIT
CLERK

FOLEY TRACTOR CO., INC.,
an Alabama Corporation,

Plaintiff

vs.

PAUL L. BONNELL,

Defendant

§

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

§

AT LAW

§

§

CASE NO. 9215

REQUEST FOR WRIT OF DISCOVERY

TO THE HONORABLE EUNICE BLACKMON, CLERK OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Whereas, in the above entitled cause the Plaintiff recovered a judgment against the said Defendant, in Case No. 9215, at law, on the 10th day of March, 1971, for the sum of TWO THOUSAND FIVE HUNDRED FORTY-NINE AND 75/100 (\$2,549.75) DOLLARS, besides the costs of said cause; and whereas, execution was issued on said judgment against the said Paul L. Bonnell on the 20th day of March, 1971, the said execution was returned by the Sheriff of Baldwin County, Alabama, with the endorsement thereon "No Property Found," and said judgment remains unpaid and unsatisfied.

Now, therefore, this is to request you as Clerk of said Court to issue a notice to said Paul L. Bonnell requiring him to file in the Circuit Court, within thirty (30) days from service of notice, a statement in writing, under oath, of all the assets of the said Paul L. Bonnell, including money, personal and real property, choses in action, bonds and documents, with a detailed description of the same, place of employment, contracts for the growth and sell of crops, with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of all liens, mortgages or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Dated this 14 day of November, 1972.

Daniel E. Robison
DANIEL E. ROBISON

Defendant Paul L. Bonnell lives at Daphne, Alabama just east of the
Rosemont Nursing Home. His phone number is 928-9678.

FILED

NOV 17 1972
EUNICE B. BLACKMON
CLERK

Daniel E. Robison

ATTORNEY AT LAW

P. O. BOX 794

117 SO. ALSTON ST.

FOLEY, ALABAMA 36535

(205) 943-4955

May 17, 1972

Clerk of the Court
Baldwin County Circuit Court

RE: Foley Tractor Co., Inc.
vs: Paul L. Bonnell #9215

We already have a judgment against the Defendant.
and this action should already be off the calender.
Please dismiss on behalf of the Plaintiff.

Dan Robison

DER/je

cc: Foley Tractor Co. Inc.

OK

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: Paul L. Bonnell

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 29th DAY OF November, 1971, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID Paul L. Bonnell 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 17th DAY OF November, 1972.

Ernie B. Blackmon
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED Paul L. Bonnell AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernie B. Blackmon
CLERK

Received 17 Nov 72
and on 20 day of Nov 1972
I served a copy of this writ of discovery
on Paul L. Bonnell

By service on Paul L. Bonnell

TAYLOR WILKINS, Sheriff
By J. Messer D.S.

Sheriff's Office 5-4
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
By J. Messer
DEPUTY SHERIFF

NOTICE OF WRIT OF DISCOVERY

CASE # 9215

FOLEY TRACTOR CO. INC. AN ALA. CORP.

VS:

PAUL L. BONNELL

Deft. Address: Daphne, Alabama
just east of the Rosemont Nursing Home.
His phone number is 938-9678

RECEIVED

NOV 17 1972

TAYLOR WILKINS
SHERIFF

, Daniel E. Robison
Attorney for Plaintiff

COMES NOW PAUL L. BONNELL, for answer to the Discovery Notice for Assets of Judgement Debtor and files this his answer under oath as provided in Title 7, Section 903, Alabama Code 1940, as amended

And the said PAUL L. BONNELL, after being duly sworn doth depose and say as follows:

I have no assets, no money, no choses in action, no notes, no bonds or accounts, and I have no other real, personal property or mixed, nor do I have any interest therein.

The only thing that I own are my personal clothes and I have no other properties.

Paul L. Bonnell
PAUL L. BONNELL

SWORN TO AND SUBSCRIBED

BEFORE ME ON THIS THE

2nd day of November,
1972.

J. Ann H. Kerr
Notary Public

FILED

NOV 27 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

THIS INSTRUMENT PREPARED BY
JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALABAMA

Goley Tractor Co. Inc.
An Ala. Corp.

Case #9215

vs.

Paul L. Bonnell

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: Paul L. Bonnell

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 29th DAY OF November, 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 Paul L. Bonnell 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 17th DAY OF November, 19 72

Ernie B. Blackburn
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SERVE THE FOLLOWING NOTICE UPON THE ABOVE NAMED Paul L. Bonnell AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernie B. Blackburn
CLERK

FOLEY TRACTOR COMPANY, INC.,
an Alabama corporation,

Plaintiff

vs.

PAUL L. BONNELL,

Defendant

§

§

§

§

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 9215

ORDER

The Plaintiff having filed his request for Writ of Discovery, and the Defendant having filed his sworn answer, and the Plaintiff having stated in its motion that it is not satisfied with the answer filed by the judgment debtor and wishes to examine said debtor, under oath, before this court, it is,

ORDERED, that the Defendant appear before this court on the 19th day of December, 1972 at 9:30 AM o'clock, to be sworn and then and there to answer the questions of the Plaintiff.

DONE, this 5th day of December, 1972.

Justin A. Madheben
Circuit Judge

FOLEY TRACTOR COMPANY, INC.
an Alabama Corporation,

Plaintiff,

vs.

PAUL L. BONNELL,

Defendant.

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

) AT LAW

) CASE NO. 9215

MOTION FOR ORAL EXAMINATION

Comes now the Plaintiff in the above captioned matter and respectfully represents and shows unto this Honorable Court as follows:

1. That it heretofore file a request for discovery of the assets of the judgment debtor, and said request was answered by the judgment debtor on, to-wit, November 22, 1972.

2. Plaintiff is not satisfied with such answer filed by the judgment debtor and wishes to examine the said debtor, under oath, before this Honorable Court.

WHEREFORE, the premises considered, Plaintiff respectfully prays that the judgment debtor be required to answer under oath before this Honorable Court; and Plaintiff prays for such other, further and different relief as to Your Honor may seem meet and proper, the premises considered.

Daniel E. Robison
DANIEL E. ROBISON

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29
day of Nov., 1972, served a
copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same
by United States mail, properly addressed, and
first class postage prepaid.

Daniel E. Robison

FILED

DEC 1 1972

CLAUDE B. BLACKMON CLERK

Case #9215

lpp

FOLEY TRACTOR COMPANY, INC. AN ALABAMA
CORPORATION,
Plaintiff

VS:

PAUL L. BONNELL,
Defendant,

*DAPHNE, ALA.
just east of Rosemont Nursing
Home - Phone # 938-9678*

MOTION & ORDER FOR ORAL EXAMINATION

RECEIVED

DEC 8 1972

TAYLOR WILKINS
SHERIFF

Daniel E. Robison,
Attorney for Plaintiff

Sheriff claims 54 miles
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY *JNEppa*
DEPUTY SHERIFF

Received 8 day of Dec 1972
and on 11 day of Dec 1972
I served a copy of the within Motion & Ord.
on Paul L. Bonnell

By service on Paul L. Bonnell

TAYLOR WILKINS, Sheriff

By *JNEppa* D. S.