

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

June 22, 1970

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

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. CGALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
THOMAS GUY GREAVES, III

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

Re: Marvin T. Robinson v. Charles A. Boller

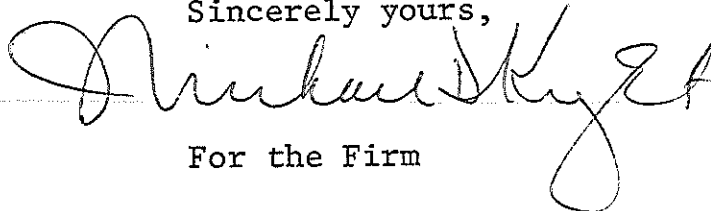
M. 9357

Dear Mrs. Duck:

We enclose herewith the original and one copy of our complaint filed on behalf of Marvin T. Robinson against Charles A. Boller and respectfully request that you file the same in the Circuit Court of Baldwin County. Would you please acknowledge receipt of this complaint by signing the enclosed tissue copy of this letter and returning it to us in the attached self-addressed, stamped envelope.

Thank you for your assistance.

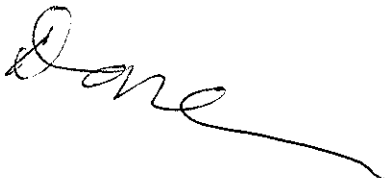
Sincerely yours,



For the Firm

MDK.1a

Enclosures



MARVIN T. ROBINSON,
Plaintiff

IN THE CIRCUIT COURT OF

vs:

BALDWIN COUNTY, ALABAMA

CHARLES A. BOLLER,
Defendant

AT LAW, CASE NO. 9357

ORDER TO SHOW CAUSE

UPON CONSIDERATION OF THE PETITION FILED HEREIN BY THE
ABOVE NAMED PLAINTIFF ON THE 22nd DAY OF November
1971, PRAYING THAT THE DEFENDANT BE CITED AS FOR A CONTEMPT, IT
IS

ORDERED, ADJUDGED AND DECREED BY THE COURT THAT THE SAID
Charles A. Boller, DO BE AND APPEAR BEFORE
THE COURT AT 12:00 O'CLOCK A.M. ON THE 1st DAY OF
December, 1971 AND SHOW CAUSE, IF ANY HAVE HE,
WHY HE SHOULD NOT BE HELD IN CONTEMPT FOR WILFULLY REFUSING TO
FILE SAID STATEMENT OF ASSETS AS REQUIRED BY LAW.

LET A COPY OF SAID PETITION AND DECREE BE SERVED UPON
THE SAID DEFENDANT.

DATED THIS 22nd DAY OF November, 19 71.

J. A. M. M. M. M. M.
CIRCUIT JUDGE

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

December 10, 1971

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

re: Robinson vs. Boller
Case # 9357

Dear Mrs. Blackmon:

We have taken a default judgment against Mr. Boller. The defendant's attorney is Tom Underwood. This case is on the non-jury civil docket for December 13; please have this case passed.

Thank you.

Sincerely,

Michael D. Knight (by RS.)

For the Firm

rs.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR - FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNEMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

January 6, 1972

Thomas W. Underwood, Jr., Esquire
Attorney at Law
P. O. Drawer 458
Foley, Alabama

Re: Marvin T. Robinson vs.
Charles A. Boller
Case Number 9357

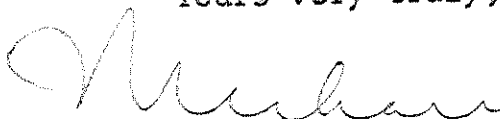
Dear Tom:

This will acknowledge with thanks yours of December 20, 1971, enclosing check in the amount of \$383.91 as full settlement of this case. Your letter also indicates that you are sending to Mrs. Blackmon a check in the amount of \$41.10 in full payment of costs.

I am, therefore, by carbon copy of this letter advising Mrs. Blackmon of the settlement and requesting that she formally enter a notice of dismissal on the docket.

Best regards.

Yours very truly,



For the Firm

MDK.er

✓ CC: Mrs. Eunice Blackmon, Clerk

MARVIN T. ROBINSON,

 Complainant.
 VS.
 CHARLES A. BOLLER,

 Defendant.

IN THE CIRCUIT COURT
 OF
 BALDWIN
 MOBILE COUNTY, ALABAMA.
 NO. 9357

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA }
 COUNTY OF MOBILE }

NOW comes, MICHAEL D. KNIGHT
 who being first duly sworn, deposes and says that the defendant herein,
 CHARLES A. BOLLER
 was not at the time of the filing of this suit, and is not now in the Military or Naval Service of
 the United States.

The Defendant resides at _____

Michael D. Knight

Sworn to and subscribed before me,
 this 10 day of March

1971
Forrest M. Mitchell
 NOTARY PUBLIC, MOBILE COUNTY, ALA.

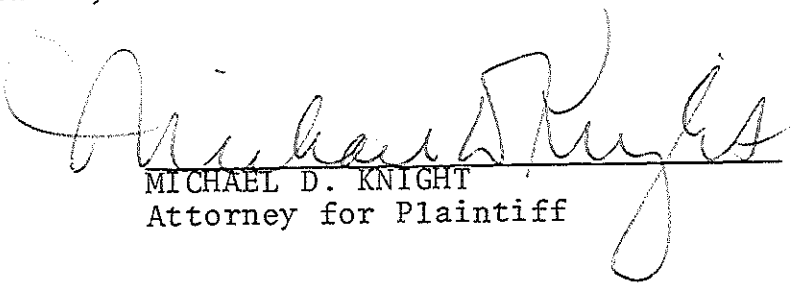
FILED 3-11-71
Ernest B. Blackburn
 REGISTER

9257

MARVIN T. ROBINSON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
CHARLES A. BOLLER,)
Defendant.) CASE NO. 9357

N O T I C E

Plaintiff herein having recovered judgment on March 11, 1971, against the defendant in the above styled cause for the sum of THREE HUNDRED EIGHTY-THREE AND 91/100 (\$383.91) DOLLARS, and costs in the sum of TWENTY-THREE AND 70/100 (\$23.70) DOLLARS, 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 will issue a notice to the above named defendant requiring him within thirty 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 wheresoever located as provided Code 1940, Title 7, Section 903.


MICHAEL D. KNIGHT
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at:

c/o Boller's Service Station
Foley, Alabama

FILED

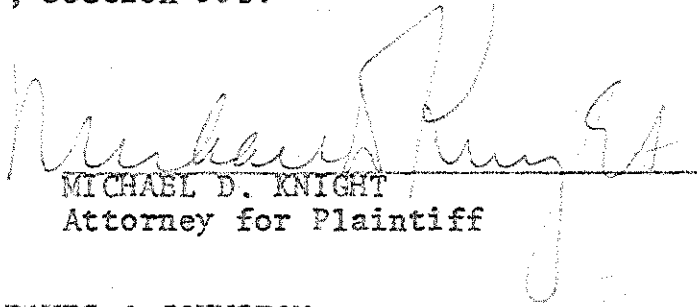
AUG 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK

MARVIN T. ROBINSON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
CHARLES A. BOLLER,)
Defendant.) CASE NO. 9357

NOTICE

Plaintiff herein having recovered judgment on March 11, 1971, against the defendant in the above styled cause for the sum of THREE HUNDRED EIGHTY-THREE AND 91/100 (\$383.91) DOLLARS, and costs in the sum of TWENTY-THREE AND 70/100 (\$23.70) DOLLARS, 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 will issue a notice to the above named defendant requiring him within thirty 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 wheresoever located as provided Code 1940, Title 7, Section 903.


MICHAEL D. KNIGHT
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at:

c/o Boller's Service Station
Foley, Alabama

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

August 25, 1971

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

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. G. HAND
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W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

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

RE: Marvin T. Robinson vs.
Charles A. Boller
Case Number 9357

Dear Mrs. Blackmon:

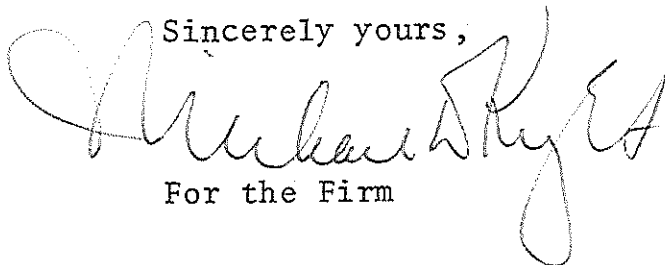
On March 11, 1971, I took a default judgment against Charles Boller, Boller's Service Station, Foley, Alabama. I have heard nothing from him with respect to the satisfaction of this judgment. Therefore, would you please let execution issue to the Sheriff's Department of Baldwin County in satisfaction. However, I know of no specific assets on which the Sheriff's Department could levy to satisfy this judgment. Therefore, I am by carbon copy of this letter requesting the Honorable Taylor D. Wilkins, Sheriff of Baldwin County, to return the writ "no property found" — *Not yet* —

On return of the writ as indicated, would you please file and serve on the defendant at the address indicated the enclosed notice to the defendant requiring that he file with this court a statement in writing of his assets.

Thank you for your assistance.

Best regards.

Sincerely yours,



For the Firm

MDK.er
Enclosure

CC: The Honorable Taylor D. Wilkins, Sheriff

MARVIN T. ROBINSON,
Plaintiff

IN THE CIRCUIT COURT OF

vs:

BALDWIN COUNTY, ALABAMA

CHARLES A. BOLLER,
Defendant

AT LAW, CASE NO. 9357

ORDER TO SHOW CAUSE

UPON CONSIDERATION OF THE PETITION FILED HEREIN BY THE
ABOVE NAMED PLAINTIFF ON THE 22nd DAY OF November
1971, PRAYING THAT THE DEFENDANT BE CITED AS FOR A CONTEMPT, IT
IS

ORDERED, ADJUDGED AND DECREED BY THE COURT THAT THE SAID
Charles A. Boller, DO BE AND APPEAR BEFORE
THE COURT AT 10:00 O'CLOCK A.M. ON THE 1st DAY OF
December, 1971 AND SHOW CAUSE, IF ANY HAVE HE,
WHY HE SHOULD NOT BE HELD IN CONTEMPT FOR WILFULLY REFUSING TO
FILE SAID STATEMENT OF ASSETS AS REQUIRED BY LAW.

LET A COPY OF SAID PETITION AND DECREE BE SERVED UPON
THE SAID DEFENDANT.

DATED THIS 22nd DAY OF November, 19 71.

Justin A. Mosley
CIRCUIT JUDGE

MARVIN T. ROBINSON,)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
vs.)
) AT LAW
CHARLES A. BOLLER,)
) CASE NUMBER 9357
)

MOTION FOR RULE NISI

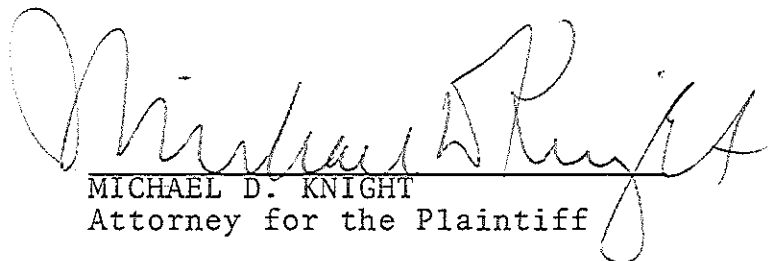
Comes now the plaintiff in the above-styled cause,
and respectfully shows unto the court as follows:

1. That heretofore and on, to-wit, March 11, 1971,
a judgment by default was entered in this case against
the defendant, Charles A. Boller.

2. Execution having been returned "not found" a
writ of discovery was issued on August 30, 1971 and
served on the defendant on September 3, 1971.

3. That more than thirty days have elapsed and no
answer has been filed to said writ of discovery.

WHEREFORE, THE PREMISES CONSIDERED, the plaintiff
respectfully moves this court for an order requiring
the defendant to appear and show cause why he should not
be held in contempt of court for failing to respond to
said writ.


MICHAEL D. KNIGHT
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

NOV 22 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Subscribed 34 day of Nov. 1971
Filed on 1 day of Dec. 1971
I served a copy of the within Motion & Order
on Charles A. Beller

by Taylor Wilkins, Sheriff
TAYLOR WILKINS, Sheriff
Charles A. Beller
D. S.

Sheriff's Office
Miles at
Total 572
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

9357

Marvin J. Robinson
vs.
Charles A. Beller

Motion & Order

NOV 24 1971
TAYLOR WILKINS
SHERIFF

Hand, Arendall, Atty

Marvin T. Robinson

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

Charles A. Boller

Defendant

AT LAW, CASE NO. 9357

NOTICE TO DEFENDANT

TO:

Take notice that upon the written request of Michael D. Knight, 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 30 day of Aug, 1971.

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

Charles A. Boller Defendant, and make due return thereon, according to law.

Witness my hand this the 30 day of Aug, 1971.

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

Received 30 day of Aug. 1971
and on Sept day of 3 1971
I served a copy of the within notice
on Charles A. Boller
By service on Charles A. Boller

TAYLOR WILKINS, Sheriff
By: Roger Wynn S.S.

Sheriff claims 17 miles at
Ten Cents per mile Total \$ 1.20
TAYLOR WILKINS, Sheriff
By: Roger Wynn
DEPUTY SHERIFF

9357

Marvin J. Robinson

vs.

Charles A. Boller
% Boller's Ser. Sta.

Wiley

Notice -

AUG 30 1971

RECEIVED
SHERIFF

FILED

AUG 30 1971


EUNICE B. BLACKMON CIRCUIT
CLERK

Hand, Arendall, Bedsole
& Greaves + Johnson

MARVIN T. ROBINSON, § IN THE CIRCUIT COURT OF
Plaintiff, § BALDWIN COUNTY, ALABAMA,
vs. § AT LAW
CHARLES A. BOLLER, §
Defendant. § CASE NO. 9357

C O M P L A I N T

Plaintiff claims of the defendant the sum of FOUR HUNDRED AND NO/100 (\$400.00) DOLLARS for that heretofore and on, to-wit, July 17, 1969, plaintiff's automobile was being operated on or along Alabama Highway 180 at a point approximately 6.5 miles east of Gulf Shores, Alabama, at which said point said Alabama Highway 180 is a public road in Baldwin County, Alabama, and at said time and place the defendant so negligently operated his automobile as to cause or allow the same to collide with plaintiff's automobile, and as a proximate result of the defendant's negligence as aforesaid plaintiff's automobile was broken, bent, smashed and damaged and rendered less valuable; hence this suit.


MICHAEL D. KNIGHT
Attorney for Plaintiff
3000 First National Bank Building
Mobile, Alabama 36602

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served
care of Boller's Service
Station, Foley, Alabama.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

} No. 9357

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Charles A. Boller

.....
.....
.....

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.....

..... Charles A. Boller Defendant.....

by Marvin T. Robinson

..... Plaintiff.....

Witness my hand this..... 25 day of..... June 19..70.

....., Clerk

84/
6-27-70

No. 9357

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MARVIN T. ROBINSON

Plaintiffs

vs.

CHARLES A. BOLLER

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUN 25 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

Michael D. Knight
(Hand, Arendall et al) Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

June 25 19 70

Taylor Wilkins Sheriff

I have executed this summons

this June 27 19 70
by leaving a copy with

Charles Boller

72 Sheriff claims miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY C. Childress
DEPUTY SHERIFF

72
Sheriff

Deputy Sheriff