

SUMMONS AND COMPLAINT

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
CASE NUMBER _____
TERM, 1970

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Fred R. Medlin 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 Fred R. Medlin, Defendant, by Montgomery Ward, Plaintiff.

WITNESS my hand this 12th day of July, 1970.

Oliver Luck REGISTER.

* * * * *

MONTGOMERY WARD,	§	IN THE CIRCUIT COURT OF
PLAINTIFF,	§	BALDWIN COUNTY, ALABAMA
-VS-	§	AT LAW
FRED R. MEDLIN,	§	CASE NUMBER <u>9388</u>
DEFENDANT.	§	

COUNT ONE

The Plaintiff claims of the Defendant One Thousand One Hundred Seventy-two and 94/100 (\$1,172.94) Dollars, due from him by account on the 30th day of March, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant One Thousand One Hundred Seventy-two and 94/100 (\$1,172.94) Dollars, on account stated between the Plaintiff and the Defendant on the 30th day of March, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant One Thousand One Hundred Seventy-two and 94/100 (\$1,172.94) Dollars, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 30th day of March, 1970, which sum of money, with interest thereon, is still unpaid.

There is attached hereto a certified verified statement of the account due in this cause.

Kenneth Cooper
ATTORNEY FOR PLAINTIFF

FILED

JUL 17 1970

ALICE J. BUCK CLERK
REGISTER

24/
5-12-71

B-8 CHAS. S. L. E.
CASE NO. 2388

MONTGOMERY WARD,

PLAINTIFF,

-VS-

FRED R. MEDLIN,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

ATTORNEY FOR PLAINTIFF

KENNETH COOPER

% NORTON TOWSON (CUSTODIAN)
MONTGOMERY, ALA.
JUL 1 1970
FILED
CLERK OF COURT
BALDWIN COUNTY, ALABAMA

DEFENDANT'S ADDRESS:

Fred R. Medlin
Point Clear,
Alabama

Received 22 day of July 19 70
and on 12 day of Aug 19 71
I served a copy of the within S & C
on Fred R. Medlin
By service on _____

TAYLOR WILKINS, Sheriff
Taylor Wilkins

FILED
JUL 1 1970
CLERK OF COURT
BALDWIN COUNTY, ALABAMA
7/18
TAYLOR WILKINS

STATEMENT



MONTGOMERY WARD

275

Fred R. Medlin
Box 157
Point Clear, Alabama 36564

ACCOUNT NO. 692 721 624

Service Charge:

DATE June 23, 19 70

			Credit	Debit	Balance
March	1966		10 00	40 99	30 99
April		.46	5 00	292 87	318 42
May		4.91	16 00	8 33	315 66
June		4.88	16 00	44 37	348 91
July		5.27	18 00	47 37	385 59
Aug.		5.93	14 00		365 45
Sept.		5.64	24 00	60 30	407 37
Oct.		6.29	25 00		388 66
Nov.		6.02	25 00	31 24	400 92
Dec.		6.20	25 00	161 81	540 55
Jan.	1967	8.04	29 00		519 29
Feb.		7.88	29 00		495 47
March		7.89	29 00		477 36
April		7.67	29 00		452 83
May		6.62	29 00	156 72	589 87
June		8.84	30 00	3 09	571 80
July		8.27	30 00		550 07
Aug.		6.95	30 00		527 02
Sept.		7.31	30 00	140 25	644 38
Oct.		8.83	33 00	68 83	683 15
Nov.		9.13	35 00		657 26
Dec.		8.94	35 00		631 22
Jan.	1968		35 00	239 00	845 00
Feb.			800 00		58 00

3.38 Cr.

6.09 Cr.

I hereby certify the above to be a true Statement of customer's account.

State of MISSOURI
County of JACKSON SS

MONTGOMERY WARD & CO., INCORPORATED

For Credit Manager

Subscribed and sworn to before me this 23rd. day of June, A.D. 19 70

My Commission Expires Nov. 2, 1970

My commission expires: _____

Notary Public

STATEMENT



MONTGOMERY WARD

275

Fred R. Medlin
Box 157
Point Clear, Alabama 36564

ACCOUNT NO. 692 721 624		Service Charge:	DATE June 23,		19 70
			Credit	Debit	Balance
March	1968			27 00	85 00
April			20 00		67 00
May			10 00	257 00	314 00
June		4.71	20 00	5 14	304 14
July		4.56	35 00	135 82	409 52
Aug.		6.14	25 00	11 51	402 17
Sept.		6.03	25 00	20 30	403 50
Oct.		6.05	25 00	27 84	412 39
Nov.		6.19	25 00	177 46	571 04
Dec.		8.57		131 06	710 67
Jan.	1969	10.66	25 00	66 09	762 42
Feb.		11.44	25 00	19 17	768 03
March		11.52	39 00	30 79	771 34
April		11.57	39 00	41 74	785 65
May		11.78	40 00	67 13	824 56
June		12.37	42 00	46 10	841 03
July		12.62		208 68	1,062 33
Aug.		15.93			1,078 26
Sept.		16.17			1,094 43
Oct.		16.42	54 00		1,056 85
Nov.		15.85			1,072 70
Dec.		16.09			1,088 79
Jan.	1970	16.33			1,105 12
Feb.		16.58			1,121 70
March		16.83			1,138 53

I hereby certify the above to be a true Statement of customer's account.

State of MISSOURI)
County of JACKSON) SS

MONTGOMERY WARD & CO., INCORPORATED

B. E. Kern
For Credit Manager

Subscribed and sworn to before me this 23rd. day of June, A.D. 19 70

My commission expires: My Commission Expires Nov. 2, 1970

LeRoy E. Phillips
Notary Public



MONTGOMERY WARD

275

Fred R. Medlin

ACCOUNT NO. 692 721 624

Service Charge

DATE June 23, 19 70

[illegible]

I hereby certify the above to be a true Statement of customer's account.

State of MISSOURI)

County of JACKSON) SS

MONTGOMERY WARD & CO., INCORPORATED

For Credit Manager

Subscribed and sworn to before me this 23rd. day of June, A.D. 19 70

My commission expires: _____ My Commission Expires Nov. 2, 1970

Notary Public

MONTGOMERY WARD,	Y	IN THE CIRCUIT COURT OF
Complainant	Y	BALDWIN COUNTY, ALABAMA
-VS-	Y	AT LAW
FRED R. MEDLIN,	Y	CASE NO. 9388
Defendant	Y	

REQUEST FOR DISCOVERY OF ASSETS

The Plaintiff herein having recovered on the 24th day of September, 1970, a Judgment against the Defendant in the above styled cause for the sum of One Thousand Two Hundred Six and 70/100 (\$1,206.70) and costs and such 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 the Court will issue a notice to the said Fred R. Medlin requiring him to file in this Honorable Court within thirty days from the service of such notice, a statement in writing under oath, of all the assets of the said Fred R. Medlin, including money, choses in action, notes, bonds and accounts and all other property, real, personal or mixed, of any interest therein with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or encumbrances thereon, showing the amounts due upon each, and the owner or holder of each lien, encumbrance or mortgage.

The said Fred R. Medlin resides at Point Clear, Alabama.

Dated this 9 day of November, 1970.

Kenneth Cooper
ATTORNEY FOR PLAINTIFF

FILED

NOV 10 1970

ALICE J. DUCK CLERK
REGISTER

MONTGOMERY WARD,

Complainant

-VS-

FRED R. MEDLIN

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

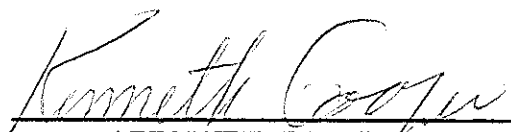
CASE NO. 9388

REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered on the 24th day of September, 1970, a Judgment against the defendant in the above styled cause for the sum of One Thousand Two Hundred Six and 70/100 (\$1,206.70) Dollars and costs and such 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 the Court will issue a notice to the said Fred R. Medlin requiring him to file in this Honorable Court within thirty days from the service of such notice, a statement in writing under oath, of all the assets of the said Fred R. Medlin, including money, choses in action, notes, bonds and accounts and all other property, real, personal or mixed, of any interest therein with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or encumbrances thereon, showing the amounts due upon each, and the owner or holder of each lien, encumbrance or mortgage.

The said Fred R. Medlin resides at Magnolia Springs, Alabama.

Dated this 17th day of July, 1973.



ATTORNEY FOR PLAINTIFF
109 East 1st Street
Bay Minette, Alabama 36507

FILED

JUL 18 1973

EUNICE B. BLACKMON CIRCUIT CLERK

SERVE:

Fred R. Medlin
Magnolia Springs, Ala.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9388

* * * * *

MONTGOMERY WARD

Plaintiff

-VS-

FRED R. MEDLIN

Defendant

* * * * *

COUNSEL FOR PLAINTIFF:

Kenneth Cooper
Post Office Box 1000
Bay Minette, Alabama 36507
Phone (205) 937-7412

MONTGOMERY WARD,

Complainant

-VS-

FRED R. MEDLIN

Defendant

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


CASE NO. 9388

REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered on the 24th day of September, 1970, a Judgment against the defendant in the above styled cause for the sum of One Thousand Two Hundred Six and 70/100 (\$1,206.70) Dollars and costs and such 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 the Court will issue a notice to the said Fred R. Medlin requiring him to file in this Honorable Court within thirty days from the service of such notice, a statement in writing under oath, of all the assets of the said Fred R. Medlin, including money, choses in action, notes, bonds and accounts and all other property, real, personal or mixed, of any interest therein with a detailed description of the same, the location and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or encumbrances thereon, showing the amounts due upon each, and the owner or holder of each lien, encumbrance or mortgage.

The said Fred R. Medlin resides at Magnolia Springs, Alabama.

Dated this 17th day of July, 1973.



ATTORNEY FOR PLAINTIFF
109 East 1st Street
Bay Minette, Alabama 36507

MONTGOMERY WARD,
Complainant
-VS-
FRED R. MEDLIN
Defendant
I
I
I
I
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 9388

REQUEST FOR DISCOVERY OF ASSETS

The plaintiff herein having recovered on the 24th day of September, 1970, a judgment against the defendant in the above styled cause for the sum of One Thousand Two Hundred Six and 70/100 (\$1,206.70) Dollars and costs and such 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 the Court will issue a notice to the said Fred R. Medlin

requiring him to file in this Honorable Court within thirty days

from the service of such notice, a statement in writing under oath, of all the assets of the said Fred R. Medlin, including money, choses in action, notes, bonds and accounts and all other property, real,

personal or mixed, of any interest therein with a detailed des-

cription of the same, the location and reasonable value of each

item thereof, together with a detailed statement of any and all

liens, mortgages, or encumbrances thereon, showing the amounts

due upon each, and the owner or holder of each lien, encumbrance

or mortgage.

The said Fred R. Medlin resides at Magnolia Springs, Alabama.

Dated this 17th day of July, 1973.

ATTORNEY FOR PLAINTIFF

109 East 1st Street

Bay Minette, Alabama 36507

MONTGOMERY WARD,

Plaintiff

-VS-

FRED R. MEDLIN,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9,388

ORDER

The foregoing affidavit having this day been presented to the Court and the same understood, the Court is of the opinion that Plaintiff is entitled to the relief prayed for. Now, upon consideration of the same, it is

ORDERED and ADJUDGED by the Court that the said Fred R. Medlin be and appear before this Court in his own proper person at 9:00 a.m., on the 6th day of August, 1971, to submit to oral examination under oath touching the nature, location, description and value of such assets; and that the said Fred R. Medlin do, at the time and place herein named, produce and bring with him all papers, documents and/or books which may contain material evidence of his assets, including all bank accounts, cancelled checks, income taxes and savings account records covering the period since July 1, 1966.

Let a copy of this order be served forthwith upon the said Fred R. Medlin.

Dated this 19th day of July, 1971.

(S/ TELFAR J. MASHBURN)
CIRCUIT JUDGE

MONTGOMERY WARD,

Plaintiff

-VS-

FRED R. MEDLIN,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9,388

AFFIDAVIT THAT JUDGMENT DEBTOR'S AFFIDAVIT

IS NOT FULL AND CORRECT

Under authority of Title 7, Section 904, Code of Alabama, Recompiled 1958, as Amended, the judgment against above-named Defendant remaining unsatisfied, the Plaintiff files the following affidavit and prays that this Honorable Court shall make an order requiring the judgment debtor to appear before this Court on a day to be set by this Court and to submit to an oral examination under oath touching the nature, location, description and value of the assets of said judgment debtor and prays that judgment debtor be required to produce any and all papers, documents and/or books which may contain material evidence of such assets.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Martha M. Bankester, Notary Public,--State at -- Large, State of Alabama, personally appeared Kenneth Cooper who, being duly sworn, says on oath that he is the attorney of record for Montgomery Ward, Plaintiff in this cause, and he further states that to the best of affiant's knowledge, information and belief the statement heretofore filed in this cause by the Defendant does not contain a full, true and correct statement and description of such assets as required herein.

Sworn to and subscribed before me this 16th day of July, 1971.

My Commission Expires:
October 6, 1974

Kenneth Cooper
Martha M. Bankester
NOTARY PUBLIC
STATE AT LARGE, STATE OF ALABAMA

Point Clear, Alabama

-VS-

* * * * *

ALLIANCE

ATTORNEY FOR PLAINTIFF
KENNETH COOPER
Post Office Box 1000
Bay Minette, Alabama 36507

[illegible]

[Handwritten signature]

MONTGOMERY WARD,

Plaintiff

-VS-

FRED R. MEDLIN,

Defendant

§

§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9,388

ORDER

The foregoing affidavit having this day been presented to the Court and the same understood, the Court is of the opinion that Plaintiff is entitled to the relief prayed for. Now, upon consideration of the same, it is

ORDERED and ADJUDGED by the Court that the said Fred R. Medlin be and appear before this Court in his own proper person at 9:00 a.m., on the 6th day of ^{August}~~July~~, 1971, to submit to oral examination under oath touching the nature, location, description and value of such assets; and that the said Fred R. Medlin do, at the time and place herein named, produce and bring with him all papers, documents and/or books which may contain material evidence of his assets, including all bank accounts, cancelled checks, income taxes and savings account records covering the period since July 1, 1966.

Let a copy of this order be served forthwith upon the said Fred R. Medlin.

Dated this 19th day of July, 1971.

Jeferson J. Madaleno
CIRCUIT JUDGE

MONTGOMERY WARD,

Plaintiff

-VS-

FRED R. MEDLIN,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

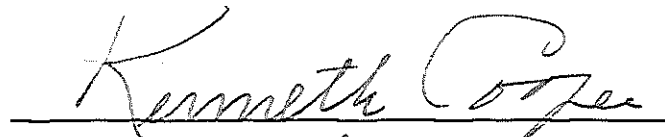
CASE NO. 9,388

AFFIDAVIT THAT JUDGMENT DEBTOR'S AFFIDAVIT
IS NOT FULL AND CORRECT

Under authority of Title 7, Section 904, Code of Alabama, Recompiled 1958, as Amended, the judgment against above-named Defendant remaining unsatisfied, the Plaintiff files the following affidavit and prays that this Honorable Court shall make an order requiring the judgment debtor to appear before this Court on a day to be set by this Court and to submit to an oral examination under oath touching the nature, location, description and value of the assets of said judgment debtor and prays that judgment debtor be required to produce any and all papers, documents and/or books which may contain material evidence of such assets.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Martha M. Bankester, Notary Public, State at Large, State of Alabama, personally appeared Kenneth Cooper who, being duly sworn, says on oath that he is the attorney of record for Montgomery Ward, Plaintiff in this cause, and he further states that to the best of affiant's knowledge, information and belief the statement heretofore filed in this cause by the Defendant does not contain a full, true and correct statement and description of such assets as required herein.



Sworn to and subscribed before me this 16th day of July, 1971.



NOTARY PUBLIC

STATE AT LARGE, STATE OF ALABAMA

My Commission Expires:
October 6, 1974

CASE NO. 9,388

MONTGOMERY WARD,

Plaintiff

-VS-

FRED R. MEDLIN,

Moved to
Box 81, Magnolia
Spring. Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

ATTORNEY FOR PLAINTIFF
KENNETH COOPER
Post Office Box 1000
Bay Minette, Alabama 36507

Sheriff claims _____ miles at

Fee Cents per mile Total \$ _____

TAYLOR WILKINS, Sheriff

BY _____ DEPUTY SHERIFF

19 71

_____ day of _____

Returned 21 days after diligent search and in-

Not found in my county after diligent search and in-
quity.

Defendant's Address _____

Point Clear, Alabama

Taylor Wilkins, Sheriff
Deputy Sheriff

By service on _____

Received 20 day of July 19 71

and on _____ day of _____ 19 71

I served a copy of the within _____

on Fred R. Medlin

Return not found. By _____ TAYLOR WILKINS, Sheriff

Return not found.
See advice on
other will.
True bill.

MONTGOMERY WARD,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW, CASE NO. 9388
FRED R. MEDLIN,)	
Defendant.)	

ANSWER TO WRIT OF DISCOVERY

Comes now the Defendant in the above styled cause, and says:

1. I am unemployed and receive no wages, am a totally disabled World War II Veteran.

2. I have no money, choses in action, notes, bonds and accounts. No real property, and personal property as follows:

1 - 1ot personal clothing \$100.00

1 - 1965 Chevrolet valued at \$750.00 mortgaged to Continental Acceptance Corporation of Mobile, Alabama with a balance of approximately \$980.00.

Done this the 13 day of January, 1971.

Fred R. Medlin
FRED R. MEDLIN

Sworn to and subscribed before me

on this the 13th day of

January, 1971.

Lucia Hughes
NOTARY PUBLIC

FILED

JAN 15 1970

ALICE J. DUCK CLERK
REGISTER

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 13 day of January, 1971

Attorney for

Fred R. Medlin
Defendant

MONTGOMERY WARD

Plaintiff

VS:

CASE NO. 9388

FRED R. MEDLIN

Defendants

WRIT OF DISCOVERY

TO FRED R. MEDLIN

TAKE NOTICE, THAT, WHEREAS THE PLAINTIF IN THE ABOVE ENTITLED CAUSE HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF SAID COURT TO ISSUE NOTICE TO YOU AS DEFENDANT IN THE ABOVE ENTITLED CAUSE AND IN THE JUDGEMENT THEREIN, REQUIRING YOU TO FILE THE STATEMENT IN WRITING UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN THE ACT OF THE LEGISLATURE OF ALABAMA, APPROVED SEPTEMBER 28, 1915, "TO PROVIDE FOR THE DISCOVERY OF ASSETS OF JUDGEMENT DEBTORS, AND TO FACILITATE THE ENFORCEMENT OR COLLECTION OF JUDGEMENTS IN COURTS OF LAW AND EQUITY IN THIS STATE," AND HAS FILED SAID REQUEST, IN WRITING, IN THIS CAUSE ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE, YOU, THE SAID FRED R. MEDLIN 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 INTERESTS 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 LENDS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS 19th DAY OF July

19 73

Eugene B. Blackmer
CLERK

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON THE ABOVE NAMED Fred R. Medlin AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Eugene B. Blackmer
CLERK

CASE #9388

MONTOMERY WARD,
 plaintiff,

VS:

FRED R. MEDLIN,
 Defendant

WRIT OF DISCOVERY

Kenneth Cooper,
 Atty. for Plaintiff

MONTGOMERY WARD

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

FRED R. MEDLIN

Defendant

AT LAW, CASE NO. 9388

NOTICE TO DEFENDANT

TO: FRED R. MEDLIN

Take notice that upon the written request of Kenneth Cooper,
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 10th day of November 1970.

Alice J. Luck
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
FRED R. MEDLIN Defendant, and make due return thereon, according
to law.

Witness my hand this the 10th day of November, 1970.

Alice J. Luck
Clerk, Circuit Court of
Baldwin County, Alabama

Defendant works at
Restaurant and Bar in
Magnolia Springs, on
Highway # 98.

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

CASE NO. 9388

MONTGOMERY WARD,

Plaintiff

VS;

FRED R. MEDLIN,

Defendant

WRIT OF DISCOVERY OF ASSETS

Received 10 day of Nov. 19 70
at 2 day of Jan 19 71
I received a copy of the within writ of disc-
on Fred R. medlin
By [Signature]

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

Kenneth Cooper, Atty.

MONTGOMERY WARD

Plaintiff

VS:

CASE NO. 9388

FRED R. MEDLIN

Defendants

WRIT OF DISCOVERY

TO FRED R. MEDLIN

TAKE NOTICE, THAT, WHEREAS THE PLAINTIF IN THE ABOVE ENTITLED CAUSE HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF SAID COURT TO ISSUE NOTICE TO YOU AS DEFENDANT IN THE ABOVE ENTITLED CAUSE AND IN THE JUDGEMENT THEREIN, REQUIRING YOU TO FILE THE STATEMENT IN WRITING UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN THE ACT OF THE LEGISLATURE OF ALABAMA, APPROVED SEPTEMBER 28, 1915, "TO PROVIDE FOR THE DISCOVERY OF ASSETS OF JUDGEMENT DEBTORS, AND TO FACILITATE THE ENFORCEMENT OR COLLECTION OF JUDGEMENTS IN COURTS OF LAW AND EQUITY IN THIS STATE," AND HAS FILED SAID REQUEST, IN WRITING, IN THIS CAUSE ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE, YOU, THE SAID FRED R. MEDLIN 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 INTERESTS 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 LENDS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS 19th DAY OF July,

19 73

Eugene B. Blackmon
CLERK

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON THE ABOVE NAMED Fred R. Medlin AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Eugene B. Blackmon
CLERK

CASE #9388

MONTOMERY WARD,
Plaintiff,

VS:

KRED R. MEDLIN,
Defendant

Deft Address; Box 157
Point Clear, Ala.

WRIT OF DISCOVERY

RECEIVED

JUL 19 1973

Kenneth Cooper,
Atty. for Plaintiff

Returned 30 day of July 19 73
Not found in my county after diligent search and no-

Taylor Wilkins, Sheriff
Deputy Sheriff

Sheriff's Office _____ miles at

Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

Received 19 day of July 19 73
and on _____ day of _____ 19 ____
I served a copy of the writ to K. R. Medlin
on Hand of Medlin

By service on _____

TAYLOR WILKINS, Sheriff

BY _____ D. S.