

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA

MONSANTO CORPORATION,
INC.,

X

X

Plaintiff,

X

vs.

X

CIVIL ACTION NO. 9434

X

CLEDIS PETERSON,

X

Defendant.

X

ORDER

This day being the day regularly set for the hearing of the above styled cause and it appearing to the Court that the post judgment discovery filed in the above styled cause having been completed, it is, therefore,

ORDERED, ADJUDGED and DECREED that the discovery in said cause be, and hereby is dismissed, with costs taxed to the Plaintiff.

DONE this 3 day of April, 1978.


Circuit Judge

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA

MONSANTO CORPORATION,
INC.,

Plaintiff,

vs.

CLEDIS PETERSON,

Defendant.

X

X

X

X

CIVIL ACTION NO. 9434

X

X

X

ORDER

This day being the day regularly set for the hearing of the above styled cause and it appearing to the Court that the post judgment discovery filed in the above styled cause having been completed, it is, therefore,

ORDERED, ADJUDGED and DECREED that the discovery in said cause be, and hereby is dismissed, with costs taxed to the Plaintiff.

DONE this ____ day of April, 1978.

Circuit Judge

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA

MONSANTO CORPORATION, INC., X
a corporation, X

Plaintiff, X

vs. X CIVIL ACTION NO. 9434

CLEDIS PETERSON, X

Defendant. X

INTERROGATORIES TO DEFENDANT, CLEDIS PETERSON

Comes now the Plaintiff, Monsanto Corporation, Inc., and requests that the Defendant, Cledis Peterson, answer the following interrogatories separately, fully and in writing and under oath within thirty (30) days from the date of service hereof pursuant to Rule 33 and Rule 69 of the Alabama Rules of Civil Procedure.

1. State your full name and residence address.
2. Are you currently employed in any capacity by any person?
 - (a) If so, state
 - (i) The name and address of your employer.
 - (ii) How long you have been employed.
 - (iii) Your wages or salary.
 - (b) If not, state all sources of income which you have received for the last six (6) months.
3. Do you have an ownership interest in any real property? If so, for each parcel of property, state:
 - (a) The address and legal description of the property.
 - (b) A description of each structure or other improvement on the property.

(c) The name and address of each person or business other than you with an ownership interest in the property.

(d) The present value of your equity interest in the property.

4. List each item and state the estimated value of all personal property owned by you with an estimated value of in excess of One Hundred Dollars (\$100.00).

5. Is any of the real or personal property owned by you, either individually, jointly or otherwise, encumbered by either a real estate mortgage, chatel mortgage or any other type of lien? If so, for each item of property, state:

(a) A description of the property encumbered.

(b) The nature of each encumbrance.

(c) The date when the property was encumbered.

(d) The name and address of each person who holds an encumbrance.

(e) The date and place of recordation and sufficient description of the recording date for each encumbrance to identify it.

6. Do you have an ownership interest in any business? If so, for each business, state:

(a) The name of the business.

(b) The address of principal place of business of the general office.

(c) The type of business conducted.

(d) The form of the business organization.

(e) The present value of your interest in the business and its percentage of the total value of the business.

7. Do you own any stock, bonds or other security of any class in any government, governmental organization, company, firm or corporation, either domestic or foreign? If so, for each organization, state:

(a) The name and address of the organization in which you own any proprietary security interest of any kind.

(b) A description of each security or other evidence of ownership.

(c) The value of each bond, share, stock certificate or other interest as of the day of your answer to these interrogatories.

8. Do you maintain any business bank accounts? If so, for each account, state:

(a) Where the account is located.

(b) The name of the bank branch holding the account.

(c) The name in which the account is held.

(d) The balance of the account as of the date of your answer.

9. Do you maintain any personal checking or savings accounts? If so, for each account, state:

(a) Where the account is located.

(b) The name of the bank branch holding the account.

(c) The name in which the account is held.

(d) The balance of the account as of the date of your answer.

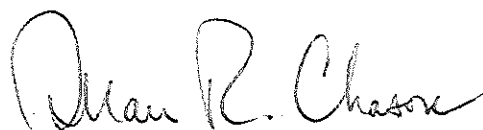
10. Do you have a joint savings or checking account with anyone? If so, for each account, state:

(a) Where the account is located.

(b) The name of the bank branch holding the account.

(c) The name in which the account is held.

(d) The balance of the account as of the date of your answer.



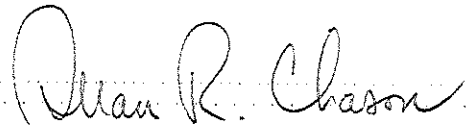
Allan R. Chason
Attorney for Plaintiff

OF COUNSEL:

CHASON & CHASON
Attorneys At Law
P. O. Box 120
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I, Allan R. Chason, attorney for Plaintiff in the above styled cause, hereby certify that on the 16th day of August, 1977, I served the foregoing Interrogatories to Defendant, Cledis Peterson, upon the Defendant, Cledis Peterson, by depositing a copy of same in the United States mails, postpaid, addressed to him at Loxley, Alabama.



Allan R. Chason
Attorney for Plaintiff

FILED

AUG 16 1977

EUNICE B. BLACKMON CIRCUIT
CLERK

CHASON & CHASON
ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA 36507

JOHN CHASON
JOHN EARLE CHASON

September 28, 1976

PHONE 937-2191

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

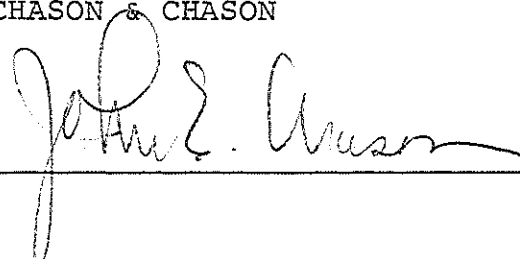
Dear Mrs. Blackmon:

Please issue execution against the Defendant in
the case of Monsanto Corporation vs. Peterson, Circuit Court
of Baldwin County, Alabama, No. 9434.

With best regards, we are

Yours very truly,

CHASON & CHASON

By: 

JEC:lh

Issued 9-29-76

MONSANTO CORPORATION, INC., X
a corporation, X

Plaintiff, X

vs. X

CLEDIS PETERSON, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 9434

MOTION FOR JUDGMENT NIL DICIT

Comes now the Plaintiff in the above styled cause, by and through its attorneys of record, and moves this Honorable Court to enter a Judgment Nil Dicit against the Defendant herein and as grounds therefor would show unto the Court as follows:

That the Defendant herein was served by personal service of the Complaint upon him on the 23rd day of April, 1971, and has to the date hereof failed to demur, answer or otherwise plead to said Complaint.

CHASON, STONE & CHASON

BY: Charles E. Ball
Attorneys for Plaintiff

FILED

JUN 28 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA

MONSANTO CORPORATION, INC., X
a corporation, X

Plaintiff, X

vs. X CIVIL ACTION NO. 9434

CLEDIS PETERSON, X

Defendant. X

FILED

SEP 21 1977

EUNICE B. BLACKMON CLERK

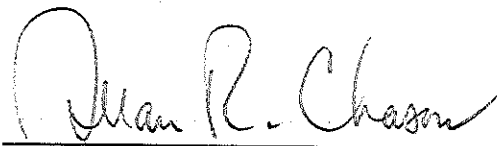
MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Comes now the Plaintiff, Monsanto Corporation, Inc.
and moves the Court for an order compelling the Defendant, Cledis
Peterson, to answer certain interrogatories propounded to him
pursuant to Rule 33 and Rule 69 of the Alabama Rules of Civil
Procedure. As grounds for such motion the Plaintiff would show
as follows:

1. That on August 16, 1977, the Defendant, Cledis
Peterson, was served by mail with certain post-judgment interroga-
tories.

2. That more than thirty-three (33) days have past
since said date and the Defendant, Cledis Peterson, has not
filed his answers to said interrogatories.

WHEREFORE, the Plaintiff, Monsanto Corporation, Inc.,
moves this Honorable Court for an order compelling the Defendant,
Cledis Peterson, to answer said interrogatories.



Allan R. Chason
Attorney for Plaintiff

OF COUNSEL:

CHASON & CHASON
Attorneys At Law
P. O. Box 120
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I, Allan R. Chason, attorney for Plaintiff in the above styled cause, hereby certify that on the 19th day of September, 1977, I served the foregoing Motion to Compel Answers to Interrogatories upon the Defendant, Cledis Peterson, by depositing a copy of same in the United States mails, postpaid, addressed to him at Loxley, Alabama.



Attorney for Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA

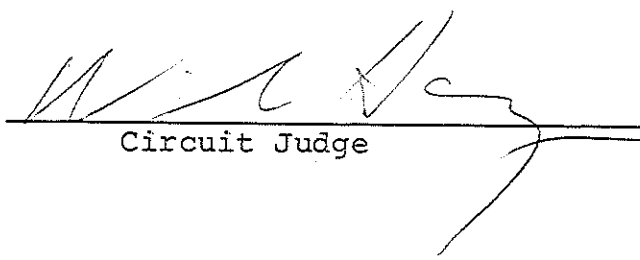
MONSANTO CORPORATION, INC.,	X	
a corporation,	X	
Plaintiff,	X	
vs.	X	CIVIL ACTION NO. 9434
CLEDIS PETERSON,	X	
Defendant.	X	

ORDER

This day came the Plaintiff, Monsanto Corporation, Inc., on motion to compel the Defendant, Cledis Peterson, to answer certain post-judgment interrogatories on file in the above styled case. The Court finds that the Defendant has failed to answer said interrogatories as required by law. It is, therefore,

ORDERED, ADJUDGED and DECREED that the Defendant answer said interrogatories separately, fully, in writing and under oath within ten (10) days from the date hereof and file said written answer in this Court and serve a copy of said answers on the attorney for the Plaintiff.

DATED this 10th day of September, 1977.


Circuit Judge

FILED

SEP 28 1977

EUNICE S. RICHMOND CLERK

SUMMONS

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cledis Peterson to appear within thirty days from the service of this Writ in the Circuit Court to be held for such County at the place of holding same, then and there to answer the Complaint of Monsanto Corporation, Inc. a corporation.

Witness my hand this 17th day of Aug, 1970.

Alice J. Luck
Clerk

MONSANTO CORPORATION, INC.
a corporation

Plaintiff

VS.

CLEDIS PETERSON

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT-LAW

9434

COUNT I

The Plaintiff claims of the Defendant the sum of \$15,866.41 due from him by account on, to-wit, July 31, 1970, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the Affidavit of a competent witness, is attached hereto and made a part hereof.

COUNT II

The Plaintiff claims of the Defendant \$15,866.41 for merchandise, goods and chattels sold by the Plaintiff to the Defendant during the period of time from, to-wit, January 22, 1967 to May 29, 1969, which sum of money with interest thereon, is still unpaid.

CHASON, STONE & CHASON

By: Edward E Ball
Attorneys for Plaintiff

The Plaintiff demands trial by jury of this cause.

CHASON, STONE & CHASON

By: Edward E Ball

FILED

AUG 17 1970

ALICE J. DUCK CLERK
REGISTER

STATE OF MISSOURI

AFFIDAVIT

St. Louis COUNTY

Before me, the undersigned authority, personally appeared Garnice LaZear, who after being by me first duly and legally sworn, did depose and say under oath as follows:

That he is an agent, servant or employee of the Monsanto Company and that as such he has personal knowledge of the account of Cledis Peterson, which is attached hereto.

That the attached account and each item thereof is, within the knowledge of the affiant, just, true and correct; that the whole and each item thereof is now due and payable and that the same is unpaid; and that all just and lawful off-sets, payments and credits have been allowed.

Garnice LaZear

Sworn to and subscribed before me this

10th day of August, 1970.

DOLORES BERG
Notary Public, St. Louis County, Missouri

My Commission Expires Apr. 4, 1974

FILED

AUG 17 1970

ALICE J. DUCK CLERK
REGISTER

Sheet No. 1Account No. 671112006

Terms

NAME

Clides Peterson

Rating

ADDRESS

Box 206, Lapley, ArizCredit Limit 4500.00

18-153

"EYE EASE" HAMMERMILL LEDGER

Date
19 67

ITEMS

FOLIO

✓

DEBITS

CREDITS

BALANCE

1-31-67

Bal. Adv

2594.00

2-21

2468 - 11 tons 8-8-8 - 270 Kmg

506.00

3100.00

2-21

2499 - 150 tons 8-8-8 - 270 Kmg

6452

3164.50

3-1

2534 - 5 tons 8-8-8 - 270 Kmg

413.35

3207.85

3-1

2533 - 5 tons 8-8-8

205.00

3412.85

3-3

2853 - 4 tons 8-8-8

176.00

3588.85

3-6

2803 - 5 tons 8-8-8

210.00

3798.85

3-7

2828 - 5 tons 8-8-8

210.00

4008.85

7-3

006045 - Breeding Fee

125.00

3883.85

8-1

Adv. Adv

22.80

3906.65

9-1

Adv. Adv

22.80

3929.45

10-1

Adv. Adv

22.80

3952.25

11-1

Adv. Adv

22.80

3975.05

12-1

Adv. Adv

29.13

4004.18

1-1-68

Adv. Adv

29.13

4033.31

1-20

Chy. Adv

268.46

4301.77

1-22

301096 - 10 tons 8-8-8 - 270 Kmg - Adv. Adv

440.00

4741.77

1-23

301085 - 10 tons 8-8-8 - 270 Kmg

460.00

5201.77

1-26

301106 - 8 tons 8-8-8 - 270 Kmg

352.00

5553.77

1-29

301119 - 10.50 tons 8-8-8 Kmg Adv

462.00

6015.77

2-1

301141 - 5 tons 8-8-8

230.00

6245.77

2-1

301153 - 3.1 tons 4-12-12 Adv

120.50

6366.27

2-1

301152 - 10 tons 8-8-8

440.00

6806.27

Account No. 41111 000 0Sheet No. 2

NAME

Clidia Peterson

Terms

ADDRESS

Rating

Credit Limit

Date 19__	ITEMS	FOLIO	✓	DEBITS	CREDITS	BALANCE
						2339.96
2-1-68	301172 - 50 ton 8-8-8 - Kum	L & Q.		22.00		2361.96
2-1-68	301266 - 1.50 ton 8-8-8 - Kum	L & Q.		69.75		2431.71
2-13	301276 - 75T 4-12-12 - Kum	E. & S.		33.37		2465.08
2-20	301380 - 8 ton - 3 ton 15-15-15	E. & S.		241.50		2706.58
3-1	301406 - Corn - Spreckley	Corn		84.00		2790.58
3-1	301405 - ✓ 14 ton 0-4-14	Corn		516.00		3306.58
3-1	301404 - P.M. - Rent	P.M.		16.00		3352.58
3-1	301403 - ✓ 8 ton 6-12-12 Kum	P.M.		364.00		3716.58
3-1	301422 - ✓ Rent	P.M.		8.00		3724.58
3-1	301421 - ✓ 4 ton 6-12-12 Kum	P.M.		182.00		3906.58
3-1	301442 - Corn - apply AA - 54.00	Corn		162.00		4068.58
3-1	301441 - Rent	Corn		26.90		4095.48
3-1	301440 - 2.69T AA	Corn		349.70		4445.18
3-2	301475 - Rent P.M.	P.M.		16.00		4461.18
3-2	301474 - 8 ton 6-12-12 - Kum - P.M.	P.M.		364.00		4825.18
3-4	301496 - 8 ton 8-8-8 - Linn & John	L & Q.		352.00		5181.18
3-4	301495 - 3.60T 12-12-12 - Corn	Corn		234.00		5415.18
3-4	301508 - 75T 8-8-8 - Linn & John	L & Q.		33.37		5448.55
3-8	301531 - 150 th Remand	Corn		79.50		5528.05
3-8	301530 - 17 ton 8-8-8 - L & Q.	L & Q.		722.50		6250.55
3-9	301574 - 2 ton 13-13-13	Corn		135.00		6385.55
3-9	301572 - 6.30 + 8-8-8	L & Q.		26.775		6653.30
3-9	301571 - Rent	P.M.		16.00		6669.30

68 PAGE 239

VOL

Sheet No.

3

Account No. 671172046

Terms

NAME

Clidia Putson

Rating

ADDRESS

Credit Limit



18 153 DEBIT CREDIT	Date	ITEMS	DEBIT	✓	DEBITS	CREDITS	BALANCE
		301570					6669.30
	3-9-48	8 ton 6-12-12 Km	Pym		364.00		7033.30
	3-14	301637- Rent	Pym		22.00		7055.30
	3-14	301636- 11 ton 6-12-12 Km	Pym		50.050		7555.80
	3-21	301740- 8 ton 10/10/10 E Bulldoz			452.00		8007.80
	4-1	301804- 2.5DT 16-8-8-	Cash		172.50		8180.30
	4-1	301805- 150 th Landox	Cash		78.00		8258.30
	4-8	to Current income Earn (301099				446	8253.84
	4-8	on Inu turn exception					
	4-23	181544- Rent	Pym		32.00		8285.84
	4-23	181543- 16 ton 6-12-12	Pym		696.00		8981.84
	4-25	181554- 16 ton 6-12-12	Pym		32.00		9013.84
	4-25	181553- 16 ton 6-12-12	Pym		702.00		9715.84
	5-1	181607- 10.25 1/2 6-12-12 Rent	Pym		32.50		9748.34
	5-1	181606- 10.25 1/2 6-12-12	Pym		731.25		10479.59
	5-1	181618- Rent	Pym		24.50		9740.34
	5-1	181617- 12.25T 6-12-12	Pym		551.25		10291.59
	5-1	St Louis Disc				1096	10281.53
	7-15	Spokane Disc				200.00	10081.53
	12-1	Int. Exp.			752.1		10157.14

VOL 68 PAGE 240

VOL

NAME

Cledis Peterson

ADDRESS

Terms

Rating

Credit Limit 10,000.00

Date 19 68	ITEMS	FOLIO	✓	DEBITS	CREDITS	BALANCE
4-4	515514 3 ten 6-12-12 2.35 ten 15-15-15 (Aug)			327.33		10855.23
4-4	515515 rent			6.00		11182.50
4-5	515539 1.50 ten 6-12-12 4 ten 15-15-15			379.08		11567.64
4-5	515540 rent			11.00		11578.64
4-8	515557 5 ten 15-15-15 (Aug)			402.50		11981.14
4-1	new chg.			42.55		12023.69
4-9	515571 5 ten 15-15-15			402.50		12426.19
4-17	515617 5 ten 15-15-15			402.50		12828.69
4-17	H. Linn payment				1500.00	11328.69
4-21	515635 2 ten 20-0-10			113.00		11441.69
4-21	515637 rent			4.00		11445.69
4-23	515652 3 ten 20-0-10			169.50		11615.19
4-23	515653 rent			6.00		11621.19
4-25	515674 5 ten 20-0-10			282.50		11903.69
4-25	515675 rent			10.00		11913.69
4-25	515679 3.75 ten 15-15-15 (Aug)			301.88		12215.57
5-1	515719 8 ten 6-12-12			348.00		12563.57
5-1	515720 rent			16.00		12579.57
5-5	515780 12 ten 6-12-12			522.00		13101.57
5-5	515781 rent			24.00		13125.57
5-6	515803 8 ten 6-12-12			348.00		13473.57
						13473.57

68 page 242

WOL

Credit Limit

ADDRESS

Account No. 671172046

Credit Limit 10,000		18-153 FUGAST FARMERS' CREDIT		Date	ITEMS	FOLIO	V	DEBITS	CREDITS	BALANCE
				19						
										1347357
				5-6-69	515804 rent			1600		1348957
				5-6-69	515805 5 ton E.2 (Bays)			27500		1376457
				5-7-69	515825 12 ton 6-12-12			52200		1428657
				5-7-69	515826 rent			2400		1431057
				5-1-69	Draw chgs			2798		1433855
				5-8	515851 4 ton 15-15-15			31000		1464855
				5-8	515852 rent			800		1465655
				5-8	515853 5 ton E.2 (Bays)			27500		1493155
				5-14	515899 11 ton 15-15-15			86250		1579405
				5-14	515900 rent			2200		1580605
				5-22	515953 3 ton 15-15-15			23250		1603855
				5-22	515954 rent			600		1604455
				5-29	652705 7.47 T A.R.			67230		1671685
				5-29	652706 rent			7470		1679155
				5-29	652707 Cplg A.R. (90 A)			18000		1697155
				5-29	652708 3 ton 15.15.15 / 17 ton co. a. r.			29900		1727055
				5-29	652709 rent			800		1727855
				6-1	Draw chgs			2798		1730653
				6-12	St. Louis payment				275484	1455169
				7-1	St. Louis statement					1455268
				8-1	Senior chgs			99		1455367
				9-1	"			99		1455466

Sheet No. 8

Terms

Rating

Credit Limit 10,000 ⁰⁰

NAME

ADDRESS

Account No. 671 117 6026Cladis PetersonP.O. Box 59, Summitville, Ala. 36580

18-153

NATIONAL INDUSTRIAL CONFERENCE BOARD

19 70

ITEMS

FOLIO

✓

DEBITS

CREDITS

BALANCE

Balance
 1969 Dec. finance chg.
 1970 Jan. finance chg.
 " Feb. finance chg.
 " Mar. finance chg.
 " April finance chg.
 " May finance chg.
 " June finance chg.
 " July finance chg.

145.53

145.53

145.53

145.53

145.53

145.53

145.53

145.53

14,702.17

14,847.70

14,993.23

15,138.76

15,284.29

15,429.82

15,575.35

15,720.88

15,866.41

County Clerk's Office
Fees at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY N. J. Brown
DEPUTY SHERIFF

~~Served~~ 17 day of Aug. 1970
and on 23 day of April 1971
I served a copy of the within 24
on Cledis Peterson

By service on _____

TAYLOR WILKINS, Sheriff
H. Brown
Homer R. L.
Lofly

9434

MONSANTO CORPORATION, INC.,
a corporation

Plaintiff

vs.

CLEDIS PETERSON

Defendant

Lofly

COMPLAINT

FILED

AUG 17 1970

ALICE J. DUCK

CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA