

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 8
TELEPHONE 928-8285
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

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN R. CHILDRESS, of P.O. Box 788, Fairhope, Alabama, to appear within thirty days after the service of this summons in the Circuit Court to be held for said County, then and there to demur or plead to the complaint of La Rue Flying Service, Inc.

Witness my hand this 3rd day of Sept., 1970.

Alice J. Duck
Clerk

* * * * *

LA RUE FLYING SERVICE, INC.)

AN ALABAMA CORPORATION,)

Plaintiff)

v.)

JOHN R. CHILDRESS,)

Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO 9469

COMPLAINT

The Plaintiff, La Rue Flying Service, Inc., an Alabama Corporation, claims of the Defendant, John R. Childress, Three Hundred and Thirty-eight and no/100ths(\$338.00), due from the Defendant by account from September 13, 1967, which sum of money with interest thereon is still unpaid.

An itemized account, verified by the affidavit of a competent witness will be used in evidence on the trial of the causes and said account is filed with the complaint at the time of filing.

Daniel E. Robison
Daniel E. Robison
Attorney for Plaintiff

FILED

SEP 3 1970

ALICE J. DUCK CLERK
REGISTER

Sheet No.

Account No. *Credit Bureau*

Terms

NAME

Childress, John R.

P. O. Box 788

Fairhope, Ala. 36532

Rating

ADDRESS

Credit Limit

*Fairhope, Ala.*18-453
"EYE-EASE" HAMMERMILL LEDGERDATE
19 *64*

ITEMS

FOLIO

DEBITS

CREDITS

DR.
CR.

BALANCE

	13	Bal. Bkt. Fwd 1963							75 00
10	4 11								
	1965								
122	8 31	Cash	6999				75 00		
126	9 5	30 ² hen	7182		60 00				60 00 ✓
	1966								
8	6 10	ck.	8488				75 00		15 00
10	6 10	5 ³ hen mil.	8566				15 00		
10	6 15	5 ³ mil	8586		15 00				15 00
19	8 22	Cash	8998				15 00		
90	8 24	30 ^{2.50} hen	9038		60 00				60 00
27	9 6	30 ^{2.50} hen	9320		75 00				135 00
	9 20	30 ^{2.60} "	9644		90 00				225 00
35	9 26	Cash	9731				50 00		175 00
36	9 26	5 ^{4.00} hen	9758		20 00				195 00
	1967								
52	5 1	ck	10379				100 00		95 00
53	5 5	30 ^{2.50} corn	10445		75 00				170 00
53	5 8	3 ^{3.50} mil	10468		10 50				180 50
55	5 17	30 ^{2.75} corn	10554		82 50				263 00
99	9 13	30 ^{2.50} hen	11631		75 00				338 00

VERIFICATION OF ACCOUNT

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority on this day personally appeared Paul La Rue known to me, who being by me duly sworn states on oath that the foregoing and annexed account in favor of La Rue Flying Service, Inc., against John R. Childress for the sum of Three Hundred and Thirty-eight and np/100ths(\$338.00) Dollars is within the knowledge of affiant, just and true; that it is due and unpaid and that all lawful offsets, payments and credits have been allowed.

Paul La Rue

Subscribed and sworn to before me this 2nd day of September
1970.

Evelyn D. Thomas

MY COMMISSION EXPIRES MARCH 11, 1972.

9469

La Rue Flying
Service, Inc. an
Ala Corp.

vs.

John R. Childress

STC

FILED

SEP 3 1970

ALICE J. DUCK CLERK
REGISTER

(Next house to Otho Bishop's
store east of store)

Daniel E. Robinson

Sheriff claims 160 miles in
Ten Cents per mile Total \$ 16.00
TAYLOR WILKINS, Sheriff
BY Alice J. Duck
DEPUTY SHERIFF

Received 3 day of Sept 19 70
and on 10/14 day of Sept 19 70
I served a copy of the within STC
on John R. Childress
By service on Alice
TAYLOR WILKINS, Sheriff
BY Alice J. Duck D.S.

100 miles

\$10.00

ac

LA RUE FLYING SERVICE, INC.,
a corporation,

Plaintiff

vs.

John R Childress

Defendant

§ IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

§

AT LAW

§

§

CASE NO. 9469

REQUEST FOR WRIT OF DISCOVERY

TO THE HONORABLE EUNICE BLACKMON, CLERK OF THE CIRCUIT COURT:

Whereas, in the above entitled cause, Plaintiff recovered a judgment against the said Defendant in Case No. 9469, at law, on the 26th day of Dec 1971, for the sum of 398.84 besides the costs of said cause; and

Whereas, execution was issued on said judgment and 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 Defendant 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 John R. Childress, including money, personal or real property, choses in action, bonds and accounts, 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 and incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Dated this _____ day of October, 1972.

Daniel E. Robison
DANIEL E. ROBISON
Attorney for Plaintiff

*Def. may be served at
Box 788, Fairhope.*

FILED

OCT 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Daniel E. Robison

P. O. Box 794
PHONE 943-4955

ATTORNEY AT LAW

117 So. Alston Street
FOLEY, ALABAMA 36535


November 30, 1970

RE: LA RUE FLYING SERVICE
V.
JOHN R. CHILDRESS
CIVIL, NON-JURY, 9469

On September 3, 1970, this case was filed with verified account attached.

On September 14, the Defendant was served. Please give this file to the Judge, and ask that judgment in the amount of \$338.00, plus 6% interest for three years, or \$398.84, be granted the Plaintiff, entered on the docket sheet.

Thank you.



Daniel E. Robison
Attorney for Plaintiff,
LA RUE FLYING SERVICE

LA RUE FLYING SERVICE, INC.,

Plaintiff

vs:

JOHN R. CHILDRESS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 9469

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: John R. Childress

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 24th DAY OF October, 19 72, ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE YOU THE SAID John R. Childress 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 30th DAY OF October, 19 72.

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 JOHN R. CHILDRESS AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Ernie B. Blackmon
CLERK

CASE NO. 9469

LA RUE FLYING SERVICE, INC.,

Plaintiff,

vs:

JOHN R. CHILDRESS,

Browell, Ar

Defendant

Discovery Notice

RECEIVED

OCT 30 1972

TAYLOR WILKINS
SHERIFF

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING _____ PROCESS(ES) AND *1.00*
TRAVEL EXPENSE ON EACH OF \$ *1.50*
PROCESS(ES) OR A TOTAL OF \$ *11.50*

Received *30* day of *Oct.* 19 *72*
and on *10th* day of *Nov* 19 *72*
I served a copy of the within writ
on *John R. Childress*
By service on *John R. Childress*
J. R. Childress
TAYLOR WILKINS, Sheriff
By *J. R. Childress* D. S.

Daniel E. Robison, Atty.

The Fairhope Court

P. O. Box 549
Fairhope, Ala. 36532

338.84
398.96

23.9304
14

0114
R. Childers
Subpoena
La Rue #14
##

sec-
338.84
398.96

23.9304
14

