

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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.
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STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNOMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123
CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

June 7, 1971

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

Re: Hartford Insurance Group
vs. Harold Brashier
Case No. 9515

Dear Mrs. Blackmon:

I have enclosed herein our firm check in the amount of \$31.50 in full payment of costs in this case. Pursuant to your notice that execution against the defendant, Harold Brashier, has been returned "no property found".

Therefore, pursuant to Title 7, Section 903, Code of Alabama 1940 (Recomp. 1958), would you please issue a notice to the defendant requiring him to file in the Circuit Court of Baldwin County within 30 days from service of said notice a statement in writing under oath of all of his 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 or statement of any and all liens, mortgages, or encumbrances thereon showing the amounts due upon each, and the owner or co-owner of such liens, encumbrances or mortgages.

Thank you for your assistance.

1st June
Sincerely yours

Michael Knight
For the Firm

MDK.er
Enclosure

PROMISSORY NOTE

\$ _____ MOBILE, Alabama

December 17, 1968

For value received I/we promise to pay to the order of

THE HARTFORD INSURANCE GROUP

the sum of THREE THOUSAND EIGHT HUNDRED FIFTY & 11/100

(\$3250 11/100) DOLLARS with interest at the rate of six per

cent (6%) from maturity until paid, payable in installments

of Twenty & 00/100 (\$20.00)

DOLLARS, the first of said payments to be due February

1 1969, and each succeeding payment due on the 1st

day of each month thereafter until fully paid.

Payment is to be made at the office of Hartford

Insurance Group, Mobile, Ala.

The undersigned to this instrument severally waive as to this debt, or any renewal thereof, all rights of exemption under the laws of Alabama and agree to pay all costs, including a reasonable attorney's fee, when an attorney is employed to collect this debt. Failure to pay any installment when due will cause the entire unpaid balance to become due and payable at the option of the payee.

HAROLD BRASHER

WITNESSED:

Address _____

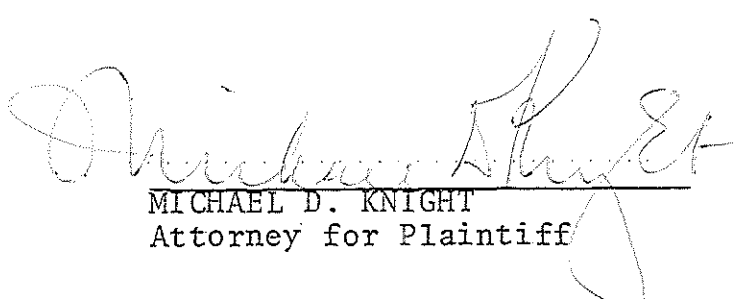
[Signature]

Address _____

THE HARTFORD INSURANCE) IN THE CIRCUIT COURT OF
GROUP, a corporation,)
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
HAROLD BRASHIER,)
Defendant.) CASE NO. 9515

C O M P L A I N T

The plaintiff claims of the defendant the sum of THREE THOUSAND EIGHT HUNDRED AND FIFTY (\$3,850.00) DOLLARS, due by Promissory Note made by him on the 17th day of December, 1968, and payable on the 1st day of April, 1970, with interest thereon. Under the terms of said note the defendant has waived all rights of exemption under the laws of Alabama and has agreed to pay all costs, including a reasonable attorney's fee.


MICHAEL D. KNIGHT
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at:

Robertsdale, Alabama

FILED

OCT 16 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9515

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Harold Brashier

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.....

Harold Brashier .., Defendant.....

by The Hartford Insurance Group, a corp.

....., Plaintiff.....

Witness my hand this.....16th.....day of.....October.....1970.....

Alice J. Duck Clerk

No. 9515

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

THE HARTFORD INSURANCE GROUP,

A Corp.

Plaintiffs

vs.

HAROLD BRASHIER

Defendants

SUMMONS AND COMPLAINT

Filed October 16, 1970

Alice J. Duck Clerk

Hand, Arendall, Bedsole, Greaves
& Johnston Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Ala.

Received In Office

Oct 16 1970

Taylor Wilkins Sheriff

I have executed this summons

this Oct 21 1970
by leaving a copy with

Harold Brashier

Sheriff claiming 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Brown

DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. H. Brown Deputy Sheriff

Moore Printing Co. Bay Minette, Ala.

50 miles RT BR
R-Dale

THE HARTFORD INSURANCE GROUP,

a corporation,

Complainant.

VS.

HAROLD BRASHIER

Defendant.

IN THE CIRCUIT COURT

OF

BALDWIN

MOBILE COUNTY, ALABAMA.

NO. 9515

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,

HAROLD BRASHIER

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

Joseph M. Pfeiffer
NOTARY PUBLIC, MOBILE COUNTY, ALA.

FILED

3-11-71

Ernie B. Blackmon
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

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October 20, 1970

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

Re: Hartford Insurance Group
vs. Harold Brashier

9515

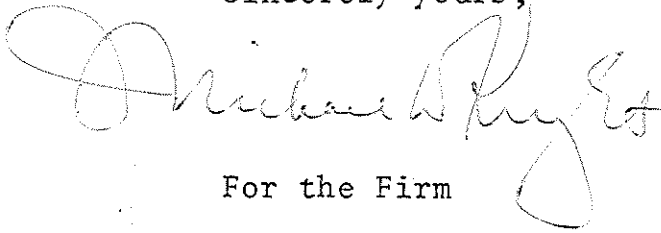
Dear Mrs. Duck:

We recently filed on behalf of The Hartford Insurance Group a Complaint against the defendant, Harold Brashier, in this case. In a note on our return copy, you have asked if this is an out of state company and, if so, requested a deposit of \$35.00. Hartford is qualified to do business in this state and has a local office here in Mobile for both sales and claims management.

Under these circumstances, I do not know whether you consider Hartford an "out of state company". If you do, however, please let me know and we will forward the deposit.

Thank you for your assistance.

Sincerely yours,



For the Firm

MDK.er

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR- FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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October 14, 1970

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

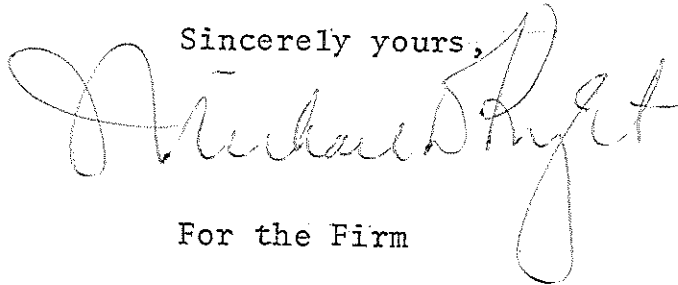
Re: Hartford Insurance Group
vs. Harold Brashier

Dear Mrs. Duck:

We enclose herein a Complaint on behalf of The Hartford Insurance Group against Harold Brashier, defendant, and respectfully request that the same be filed. Would you please acknowledge receipt of this complaint by signing the tissue copy of this letter attached hereto and returning it to me at your convenience.

Thank you for your assistance.

Sincerely yours,



For the Firm

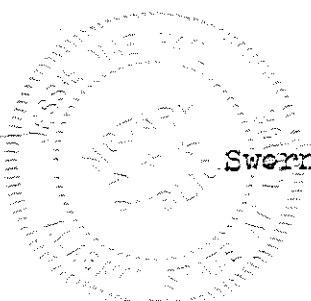
MDK.er

Enclosures

Circuit Court Of
Baldwin Counrt, Alabama

This is to certify that I, Harold Brashier, have no money, own no
Real or other property. I only have a few persenal work clothes.

Signed HAROLD BRASHIER



Sworn and subscribed to before me this 16 day of June 1971.

Jesse Mae Hail
Notary Public, Ala. State at Large
My commission expires 8/19/71

9515

FILED

JUN 18 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

287B

2

HARTFORD INSURANCE GROUP, A CORP.

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

HAROLD BRASHIER

AT LAW, CASE NO. 9515

DISCOVERY NOTICE FOR ASSETS OF JUDGEMENT DEBTOR

TO: Harold Brashier

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 1st DAY OF June, 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 Harold Brashier 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 9th DAY OF June, 19 71.

Eunice B. Blackmon
CLERK

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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

Eunice B. Blackmon
CLERK

Received 10 day of June 1971
and on 11 day of June 1971
I served a copy of the within Discovery
on Harold Brashier

By service on _____

TAYLOR WILKINS, Sheriff

By H. J. Brashier D.S.

some R T, R-dob

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
by H. J. Brashier
DEPUTY SHERIFF

HARTFORD INSURANCE GROUP, A CORP.
VS:

HAROLD BRASHIER

CASE NO: 9515

STATE OF ALABAMA:

COUNTY OF MOBILE:

Personally appeared before me the undersigned
Notary Public in and for said County in said State,
Michael D. Knight, Esquire, who being by me first duly
sworn deposes and says:

8512
My name is Michael D. Knight, and I am attorney
of record for the Hartford Insurance Group, plaintiff
in the case styled Hartford Insurance Group vs. Harold
Brashier, Case No. 9515. A judgment by default taken
March 11, 1971 in the amount of \$4,197.80 has remained
unsatisfied. The statement in writing under oath filed
by the judgment debtor, Harold Brashier, pursuant to
Title 7, Section 903, Code of Alabama 1940 (Recomp. 1958)
does not to the best of affiant's knowledge, information
and belief contain a full, true and correct statement
and description of the assets of said judgment debtor.

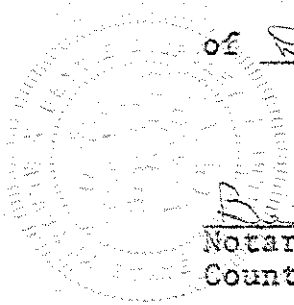

Dated this 6 day of December, 1971.


MICHAEL D. KNIGHT

Sworn to and subscribed

before me this 6th day

of December, 1971



Notary Public, Mobile
County, Alabama

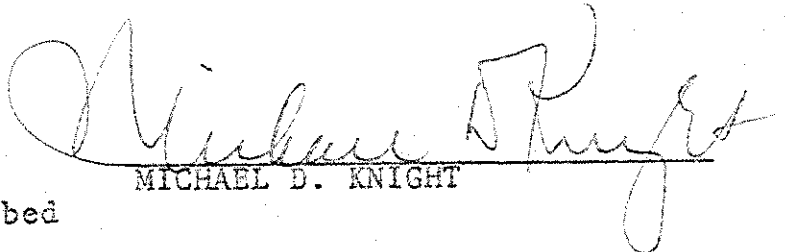
STATE OF ALABAMA:

COUNTY OF MOBILE:

Personally appeared before me the undersigned
Notary Public in and for said County in said State,
Michael D. Knight, Esquire, who being by me first duly
sworn deposes and says:

My name is Michael D. Knight, and I am attorney
of record for the Hartford Insurance Group, plaintiff
in the case styled Hartford Insurance Group vs. Harold
Brashier, Case No. 9515. A judgment by default taken
March 11, 1971 in the amount of \$4,197.80 has remained
unsatisfied. The statement in writing under oath filed
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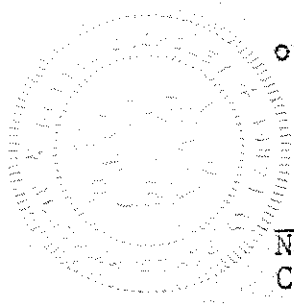
Dated this 6 day of December, 1971.


MICHAEL D. KNIGHT

Sworn to and subscribed

before me this 6th day

of December, 1971


Bettie A. Cason
Notary Public, Mobile
County, Alabama

FILED

DEC 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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

December 6, 1971

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

Re: Hartford Insurance Group
vs. Harold Brashier
Case Number 9515

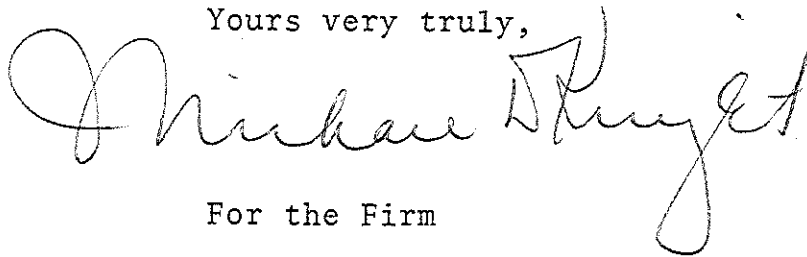
Dear Mrs. Blackmon:

Pursuant to Title 7, Section 904, Code of Alabama 1940 (Recomp. 1958), I have enclosed an affidavit and a copy of the same indicating to the best of my knowledge, information and belief that the answer previously filed by the defendant in this case containing a statement of his assets is not true and correct. Would you please issue an order pursuant to that statute requiring Mr. Brashier to appear on a day to be set by Judge Mashburn and submit to an oral examination under oath.

I would of course need notice of the date of that oral examination.

Thank you for your assistance.

Yours very truly,



For the Firm

MDK.er

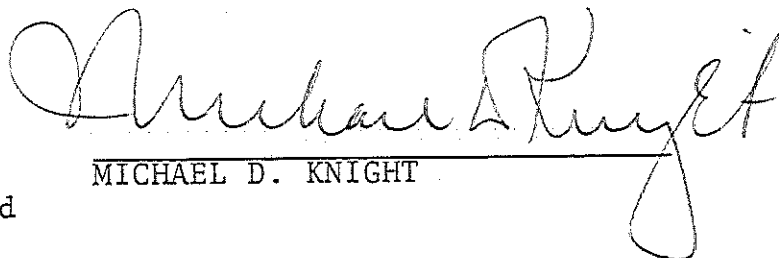
STATE OF ALABAMA:

COUNTY OF MOBILE:

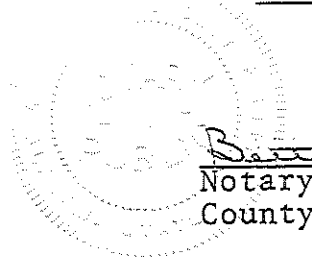
Personally appeared before me the undersigned
Notary Public in and for said County in said State,
Michael D. Knight, Esquire, who being by me first duly
sworn deposes and says:

My name is Michael D. Knight, and I am attorney
of record for the Hartford Insurance Group, plaintiff
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does not to the best of affiant's knowledge, information
and belief contain a full, true and correct statement
and description of the assets of said judgment debtor.

Dated this 6 day of December, 1971.


MICHAEL D. KNIGHT

Sworn to and subscribed
before me this 6th day
of December, 1971


Bettie M. Coker
Notary Public, Mobile
County, Alabama

FILED

DEC 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

January 12, 1972

9515

Hand, Arendall, Bedsole, Graves & Johnston
Attorney At Law
P. O. Drawer C
Mobile, Alabama 36601

Attention: Michael D. Knight

Re: Hartford Insurance Group vs. Harold Brashier, Case # 9515

Gentlemen:

On the 10th day of December I received and submitted to the Judge your affidavit and request for oral examination in the above styled case. The Judge requested that you draw an order for same and I immediately called your office for said order, to this date I have not received your order.

Yours truly,

Clerk, Circuit Court
Baldwin County, Alabama

EBB/asg

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

to Judge

7

Tell him to

prepare an order

I did 1-14-71

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

