

CASE NO. 35234 -

FRIENDLY CREDIT UNION

VS.

MAJOR J. PLATO

STATE OF ALABAMA )

COUNTY OF MOBILE )

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

I, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, hereby certify that the enclosed is a full, true and correct transcript of the orders, minutes and proceedings had in the above entitled cause and the enclosed papers Number One (1) and Two(2), both inclusive are the original pleadings filed in this Court in the above entitled cause.



---

CLERK, CIRCUIT COURT, MOBILE COUNTY, ALABAMA

N.J.

VS. Count One: Suit for \$1,163.89 w/interest due by promissory note  
Attorney's fee - \$277.52 (WAIVER)  
Count Two:- Count Three - Suit for \$621.36 w/interest due  
by promissory note. (WAIVER)

MAJOR J. PLATO

MAJOR J. PLATO

FILING DATE

4-15-71

5-3-71

43-332

JUN 2 1971

I, JOHN E. MANDEVILLE, in my capacity as Clerk of the Circuit Court of Mobile County, Alabama, hereby certify that the above is a true and correct transcript of all the minutes, orders and other proceedings in the above styled case in this Court. In Witness whereof I have hereunto set my hand and attached my Official Seal as such Clerk of said Court at Mobile, Mobile County, Alabama, on this the 1st day of June 1971.

1. as such Clerk of said Court at Mobile, Mobile

John E. Naudon, Clerk

.675-0075

April 13, 1971

STATE OF ALABAMA

CIRCUIT COURT

MOBILE COUNTY

13th JUDICIAL CIRCUIT

FRIENDLY CREDIT UNION, (a corp)

Plaintiff

VS:

MAJOR J. PLATO

Defendant

# 35237

Plaintiff claims of the defendant the sum of \$116389 with interest thereon, due by promissory note made by the defendant on to-wit: the 14th day of December 1967 which said sum with interest thereon is past due and unpaid, and Plaintiff avers that as a part of consideration of said instrument, defendant waived right to exemptions as to personal property, and agreed to pay a reasonable attorney fee for which the plaintiff claims the additional sum of \$277.52 Dollars.

COUNT TWO

Plaintiff claims of the defendant 621.36 \$ Dollars, this amount being the unpaid balance due by a promissory note made by the defendant on, to-wit: 14th day of December 1967 in the face amount of \$1400.00 Dollars and payable in monthly installments of \$54.25 Dollars, with a provision that in case of any default in payments the entire balance of said note would become immediately due and payable, at the option of the holder, which said unpaid balance became due and payable by virtue of default in an installment payment due on, to-wit, 31st day of December, 1967

Plaintiff avers that by the terms of said note, the defendant waived exemption rights as to personal property secured to Friendly Credit Union, (a corp) by law, and plaintiff claims the benefit thereof.

Plaintiff further avers that by the terms of said note, the defendant agreed to pay a reasonable attorney's fee in the event said note was placed in the hands of an attorney for collection, and the plaintiff claims the further and additional amount of \$277.52 Dollars, which plaintiff avers is a reasonable fee for making said collection.

COUNT THREE

Plaintiff claims of the defendant \$621.36 Dollars, this amount being the unpaid balance due by promissory note made by the defendant on, to-wit, the 14th day of December 1967 in the face amount of \$1400.00 Dollars and payable in monthly installments with a provision that in case of any default in payments the entire balance of said note would become immediately due and payable, at the option of the holder, which said unpaid balance became due and payable on, to-wit, 10th day of April 1970 by virtue of default in said installment payments, and plaintiff also claims interest thereon from, to-wit, 10th day of March 1970 at 1 per cent per month on the unpaid balance.

Plaintiff further avers that by the terms of said note, the defendant agreed to pay a reasonable attorney's fee in the event said note was placed in the hands of an attorney for collection, and the plaintiff claims the further and additional amount of \$277.52 Dollars, which plaintiff avers is a reasonable fee for making said collection.

COLE & WYATT, ATTORNEYS  
BY *C. Wyatt*  
1801 9th Ave. South  
Birmingham, Alabama

Plaintiff's Address

Mobile, Alabama

Defendant's Address

Rt 2 Box 231  
Bay Minette, Alabama

STATE OF ALABAMA  
I CERTIFY THIS PLEADING  
WAS FILED ON

APR 15 8 05 AM '71

*John H. Rasmussen*  
CLERK

THE STATE OF ALABAMA  
MOBILE COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama:  
You are hereby commanded to summon

MAJOR J. PLATO

to appear within thirty days from service of this process, in the Circuit Court of Mobile County, Alabama,  
at the place of holding the same, then and there to answer the complaint of FRIENDLY CREDIT  
UNION, (a corp)

WITNESS: John E. Mandeville, Clerk of said Court, this 15th day of April, 19 71

Attest:

John E. Mandeville

Clerk

SHERIFF'S RETURN

Received \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_ and on \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_, I served a copy of  
the within \_\_\_\_\_ on \_\_\_\_\_  
by service on \_\_\_\_\_

RAY D. BRIDGES, SHERIFF

By \_\_\_\_\_ D.S.

Mail

No. 35234

JUDGE \_\_\_\_\_ DOCKET \_\_\_\_\_

CIVIL DIVISION

**CIRCUIT COURT**  
MOBILE COUNTY

FRIENDLY CREDIT UNION(a corp)

VS. } Complaint and Summons

MAJOR J. PLATO

Issued 15th day of April, 1971

Defendant's Address

Route 2, Box 231  
Bay Minette, Alabama

C.H. Wyatt, Jr.

Plaintiff's Attorney

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING 1 PROCESSING, AND  
TRAVEL EXPENSE ON EACH OF \$ .80  
PROCESSING ON A TOTAL OF \$ 2.30  
BY \_\_\_\_\_

Received 21 day of April 1971  
and on 21 day of April 1971  
I served a copy of the within copy  
on Major J. Plato  
By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By H. A. Bell D.S.  
4 mobile county 7 8 17

REC'D. SHERIFF DEPT.  
MOBILE COUNTY, ALA.  
APR 23 9 11 AM

FRIENDLY CREDIT UNION, (a corp)	I	
	Plaintiff,	I
vs.		I
MAJOR J. PLATO,		I
	Defendant.	I
		IN THE CIRCUIT COURT OF
		MOBILE COUNTY, ALABAMA
		AT LAW
		CASE NO. 35234

Comes now the Defendant and appearing specially and only for the purpose of this Plea in Abatement, files the following Plea in Abatement:

That, at the time this suit was commenced, and for a period of time in excess of ten (10) years prior to said date, the Defendant was and has been a resident citizen of Bay Minette, Baldwin County, Alabama; that he has never lived in Mobile County; this Court is without jurisdiction over said suit. The venue is improperly laid in Mobile County, and this cause of action should be abated.

Major J. Plato  
Major J. Plato

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Major J. Plato, who is known to me and who being by me first duly sworn, deposes and says: That he has read the foregoing Plea in Abatement and that the matters set out therein are true and correct.

Major J. Plato  
Major J. Plato

Sworn to and subscribed before me on this the 29 day of April, 1971.

William M Brantley  
Notary Public

Wilters & Brantley  
P. O. Box 968  
Bay Minette, ALA 36507

APR 30 8 28 AM '71

Robert M. Brantley  
CLERK

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have on this 29 day of April, 1971, caused a copy of the foregoing pleading on counsel to be filed in this proceeding and mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

William M Brantley  
By

**CIVIL DIVISION, CIRCUIT COURT, MOBILE COUNTY**

FRIENDLY CREDIT UNION

Plaintiff

No. 35234

**VS.**

MAJOR J. PLATO

Defendant

(Act No. 740, Reg. Session Ala. Legislature 1957  
 Appvd. Sept. 20, 1957)  
 (Amend Sec. 21, Title 11, Code Ala. 1940)

## BILL OF COST

(Act No. 571, Reg. Ses. Leg. 1955)  
(Amend Sec. 24 and 100, Title 11, Code Ala. 1940)

CLERK'S FEES	Pltff.	Deft.	SHERIFF'S FEES	Pltff.	Deft.
Suits for \$100 or less .....\$ 6.00			Mileage \$.80		
Suits for over \$100 but less than \$1,000 ..... 10.00			Serving Summons & Complaint .....\$ 1.50	2 30	
Suits for \$1,000 and over ..... 20.00	20 00		Serving Writ of Garnishment ..... 1.50		
Suits in detinue, ejectment, etc. .... 10.00			Serving Sci Fa.-Notices ..... 1.50		
Suits not otherwise provided ..... 10.00			Levyng Attachment & Return ..... 6.25		
Writs, Mandamus, Prohibition, etc. .... 15.00			Executing Writ Possession ..... 5.00		
Appeals from Court General			Seizing personal property under Writ of Detinue ..... 6.00		
Sessions ..... 15.00			Serving subpoenas, each ..... .75		
Appeals from Probate Court ..... 20.00			Impanelling Jury ..... .75		
Appeals from JP Courts ..... 6.00			Taking & Approving Bond ..... 2.00		
Appeals from State Dept of Pub.			Collecting Costs Execution ..... 1.50		
Safety, and other State			Serving Contempt Writ ..... 1.50		
Agencies ..... 10.00			Making Deed for Property sold ..... 2.50		
Workmen's Compensation Settle. .... 10.00			Commission, collecting money on executions, 1st \$200 5%; \$200 to \$500 4%; over \$500 3% \$		
Garnishment on Judgment ..... 6.00					
Order of Sale, Motions to sell. .... 6.00			Total .....\$	2 30	
Recording executions from State					
Agencies ..... 3.00			RECAPITULATION		
Cert. Copy of Record - per			Clerk ..... 20 80		
100 words ..... .15	80		Sheriff <u>Taylor Wilkins</u>	2 30	
Taking Appeal Bond ..... .75			<u>Baldwin County</u>		
Record for Supreme Court etc.,			Inferior Civil Court .....		
per 100 words ..... .15			Justice Peace fees .....		
Add'l Copies of Record for Supreme			Witness fees .....		
Court, per 100 words ..... .05			Commissioner's fees .....		
Checking - including Reporters			Certificate of Judgment .....		
Transcript of Evidence ..... 10.00			Judgment .....		
Certifying Abstract in lieu of			10% Damages .....		
Transcript on Appeal ..... 5.00			Interest .....		
Collecting Money on Judgments			Stenographer's fees (\$10.00 Day) ....		
over 30 days old, ½ the per- centage allowed Sheriffs ..... \$			Library fee ..... 1.50	1 50	
			Trial Tax (County) ..... 1.50	1 50	
			Trial Tax (State) ..... 1.50	1 50	
			Advertisement .....		
			Garnishee's fees .....		
Total .....\$	20 80				

**\$27.60**

I respectfully beg to advise that if this bill for costs is not paid before \_\_\_\_\_ 19\_\_\_\_\_, it will be my unpleasant duty to issue execution for same.

JOHN E. MANDEVILLE, Clerk



FRIDAY, MAY 28, 1971

FRIENDLY CREDIT UNION

BOLLING -vs- 35234

MAJOR J. PLATO

)  
) PLEA IN ABATEMENT SUSTAINED,  
) AND CAUSE ORDERED TRANSFERRED  
) TO CIRCUIT COURT OF BALDWIN  
) COUNTY (DEFENDANT GAVE SWORN  
TESTIMONY)

This day in open Court came the parties by their attorneys, and defendant's Plea in Abatement filed May 3, 1971, to the complaint in this cause, coming on to be heard and being argued by counsel and understood by the Court;

It is ordered and adjudged by the Court that defendant's said Plea in Abatement filed May 3, 1971, to the complaint in this cause be, and the same is hereby sustained, and case ordered transferred to the Circuit Court of Baldwin County, Alabama, for further proceedings.

Minute Book 43

Page 332

STATE OF ALABAMA, }  
COUNTY OF MOBILE }

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

I, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, do hereby  
certify that the foregoing is a full, true and correct copy of ORDER OF COURT

as rendered by the said Circuit Court on the 28th day of May, 19 71, in the cause  
entitled No. 35234 - FRIENDLY CREDIT UNION

\_\_\_\_\_, Plaintiff,  
— versus — MAJOR J. PLATO

Defendant, (~~Together with the captioned case~~) as the same remains of record in this office in  
Minute Book No. 43, Page No. 332

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of said Court at office  
in the City of Mobile, Alabama, on this the 1st day of June, 19 71

ATTEST:

  
Clerk, Circuit Court, Mobile County, Alabama.

675-0076

Nov. 22, 1972

FRIENDLY CREDIT UNION,  
(A CORP.)

PLAINTIFF

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

VS.

MAJOR J. PLATO

DEFENDANT

CASE NO. 9863

NOTICE TO DEFENDANT TO FILE STATEMENT OF ASSETS

To: MAJOR J. PLATO, Defendant

Take notice that, whereas, the Plaintiff 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, in the judgment therein, requiring you to file a statement, in writing, under oath, of all of your assets, as provided in the Statutes of Alabama, providing for the discovery of Assets of Judgment Debtors, Title 7 - 903, and has filed said request, in writing, in this cause with the undersigned as Clerk of this Court, and it appearing from said request, and the record in said cause, that an execution was returned on this judgment in this cause on the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_ endorsed "No property Found", and that you reside in the State of Alabama.

Now, therefore, you are hereby required, within thirty 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 or statement, of any and all liens, mortgages or incumbrances thereon.

Witness my hand this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_

---

Clerk of the Circuit Court

675-0076

Nov. 22, 1972

FRIENDLY CREDIT UNION,  
(A CORP.)

PLAINTIFF

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

VS.

MAJOR J. PLATO

DEFENDANT

CASE NO. 9863

To the Clerk of the Circuit Court:

WHEREAS, In the above entitled cause, Friendly Credit Union, a corporation, Plaintiff recovered a judgment against Major J. Plato, Defendant on the 15th day of June, 1972 for the sum of One Thousand Forty and no/100 (\$1040.00) Dollars besides the cost of said cause:

AND, WHEREAS, an Execution was issued on said judgment on the 15 day of Aug 1972 and was on the 8<sup>th</sup> day of Nov. 1972 returned with the endorsement thereon of "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 this Honorable Court, within thirty days from the service of said notice, a statement in writing, under oath, of all the assets of the said Defendant, including money, choses in action, bonds and accounts, and all other property, real, personal or mixed, or any interest therein, with a detailed statement of all liens, mortgages or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Witness my hand this 1st day of Dec, 1972

Charles H. Wyatt Jr.

Attorney for Plaintiff

**FILED**

DEC 4 1972

EUNICE B. BLACKMON  
CIRCUIT  
CLERK

675-0076

Nov. 22, 1972

FRIENDLY CREDIT UNION,  
(A CORP.)

PLAINTIFF

VS.

MAJOR J. PLATO

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

CASE NO. 9863

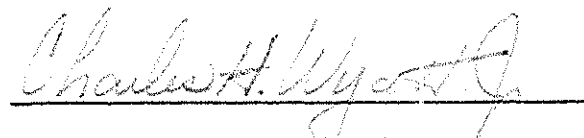
To the Clerk of the Circuit Court:

WHEREAS, In the above entitled cause, Friendly Credit Union, a corporation, Plaintiff recovered a judgment against Major J. Plato, Defendant on the 15th day of June, 1972 for the sum of One Thousand Forty and no/100 (\$1040.00) Dollars besides the cost of said cause:

AND, WHEREAS, an Execution was issued on said judgment on the \_\_\_\_ day of \_\_\_\_\_ 19\_\_ and was on the \_\_\_\_ day of \_\_\_\_\_ 19\_\_ returned with the endorsement thereon of "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 this Honorable Court, within thirty days from the service of said notice, a statement in writing, under oath, of all the assets of the said Defendant, including money, choses in action, bonds and accounts, and all other property, real, personal or mixed, or any interest therein, with a detailed statement of all liens, mortgages or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Witness my hand this \_\_\_\_ day of \_\_\_\_\_, 19\_\_.

  
Attorney for Plaintiff

675-0076

Nov. 22, 1972

FRIENDLY CREDIT UNION,  
(A CORP.)

PLAINTIFF

VS.

MAJOR J. PLATO

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

CASE NO. 9863

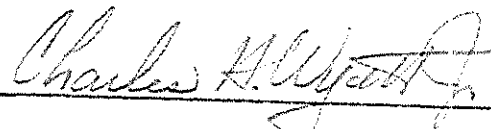
To the Clerk of the Circuit Court:

WHEREAS, In the above entitled cause, Friendly Credit Union, a corporation, Plaintiff recovered a judgment against Major J. Plato, Defendant on the 15th day of June, 1972 for the sum of One Thousand Forty and no/100 (\$1040.00) Dollars besides the cost of said cause:

AND, WHEREAS, an Execution was issued on said judgment on the \_\_\_\_ day of \_\_\_\_\_ 19\_\_ and was on the \_\_\_\_ day of \_\_\_\_\_ 19\_\_ returned with the endorsement thereon of "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 this Honorable Court, within thirty days from the service of said notice, a statement in writing, under oath, of all the assets of the said Defendant, including money, choses in action, bonds and accounts, and all other property, real, personal or mixed, or any interest therein, with a detailed statement of all liens, mortgages or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, mortgages or incumbrances.

Witness my hand this \_\_\_\_ day of \_\_\_\_\_, 19\_\_.

  
\_\_\_\_\_  
Attorney for Plaintiff

Nov. 22, 1972

FRIENDLY CREDIT UNION,  
(A CORP.)

PLAINTIFF

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

VS.

MAJOR J. PLATO

DEFENDANT

CASE NO. 9863

NOTICE TO DEFENDANT TO FILE STATEMENT OF ASSETS

To: MAJOR J. PLATO, Defendant

Take notice that, whereas, the Plaintiff 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, in the judgment therein, requiring you to file a statement, in writing, under oath, of all of your assets, as provided in the Statutes of Alabama, providing for the discovery of Assets of Judgment Debtors, Title 7 - 903, and has filed said request, in writing, in this cause with the undersigned as Clerk of this Court, and it appearing from said request, and the record in said cause, that an execution was returned on this judgment in this cause on the 8 day of Nov 1972 endorsed "No property Found", and that you reside in the State of Alabama.

Now, therefore, you are hereby required, within thirty 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 or statement, of any and all liens, mortgages or incumbrances thereon.

Witness my hand this 4 day of Dec. 1972

Genevieve B. Blackman

Clerk of the Circuit Court

Sheriff claims 4 miles at  
Ten Cents per mile Total \$ 40  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

Received 4 Dec 1972  
and on 13 day of Dec 1972  
I served a copy of the writ  
on Major J. Plato  
By service on \_\_\_\_\_

TAYLOR WILKINS  
By W. A. Zellert  
4 miles East of B...

9863  
Friendly Credit Union

re

Major J. Plato

RECEIVED

DEC 4 1972

TAYLOR WILKINS  
SHERIFF

Writ of Discovery

Call & Wyatt



Friendly Credit Union, a corporation

Plaintiff

vs.

Case No. 9863

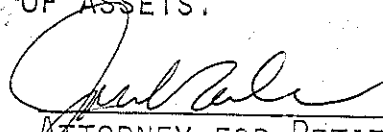
Major J. Plato

Defendant

MOTION TO SHOW CAUSE

COMES NOW PLAINTIFF IN THE ABOVE STYLED CAUSE AND SHOWS THAT ON, TO-WIT, THE 4th DAY OF December, 1972, A NOTICE WAS ISSUED OUT OF THIS HONORABLE COURT BY THE CLERK THERE OF REQUIRING THE ABOVE NAMED DEFENDANT TO FILE A STATEMENT OF ASSETS AS REQUIRED BY CODE OF 1940, TITLE 7, SECTION 903; THAT SAID NOTICE WAS DULY AND PERSONALLY SERVED ON THE SAID DEFENDANT ON THE 13th DAY OF December, 1972 BUT THAT THE SAID DEFENDANT HAS WILFULLY REFUSED TO FILE SUCH STATEMENT.

THE PREMISES CONSIDERED, PLAINTIFF PETITIONS THE COURT THAT THE SAID Major J. Plato, BE CITED FOR CONTEMPT OF COURT AND THAT HE BE REQUIRED TO APPEAR BEFORE THE COURT AT A TIME AND PLACE TO BE FIXED, TO CAUSE, IF ANY HAVE HE WHY HE SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR WILFULLY REFUSING TO FILE A STATEMENT OF ASSETS.

  
ATTORNEY FOR PETITIONER

STATE OF ALABAMA  
BALDWIN COUNTY

BEFORE ME, THE UNDERSIGNED AUTHORITY, AUTHORIZED UNDER THE LAWS OF THE STATE OF ALABAMA TO TAKE AND ADMINISTER OATH, THIS DAY PERSONALLY APPEARED John L. Cole, WHO IS KNOWN TO ME AND WHO BEING BY ME FIRST DULY SWORN TO SPEAK THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE TRUTH, DEPOSES AND SAYS HE HAS READ THE FOREGOING INSTRUMENT AND KNOWS THE FACTS THEREIN STATED, AND THAT THE FACTS THEREIN STATED ARE TRUE TO THE BEST OF his INFORMATION AND BELIEF.

SWORN TO AND SUBSCRIBED BEFORE ME THIS THE 8 DAY OF February 1974.

  
NOTARY PUBLIC.

**FILED**

FEB 11 1974

EUNICE B. BLACKMON  
CIRCUIT CLERK

Friendly Credit Union, a corporation

Plaintiff

vs.

Case No. 9863

Major J. Plato

Defendant

ORDER TO SHOW CAUSE

UPON CONSIDERATION OF THE PETITION FILED HEREIN BY THE  
ABOVE NAMED PLAINTIFF ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_  
19\_\_\_\_, PRAYING THAT THE DEFENDANT BE CITED AS FOR A CONTEMPT, IT  
IS

ORDERED, ADJUDGED AND DECREED BY THE COURT THAT THE SAID  
MAJOR J. PLATO \_\_\_\_\_, DO BE AND APPEAR BEFORE  
THE COURT AT 10:00 O'CLOCK A.M. ON THE 22nd DAY OF  
February, 1974 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 11th DAY OF February, 1974.

Jeffrey A. Wadsworth  
CIRCUIT JUDGE

Sachue

RECEIVED

FEB 13 1974

TAYLOR WILKINS

~~DEPT~~

Received 13 day of Feb 19 74  
and on 12 day of Feb 19 74  
served a copy of the within Order  
on Major Plato  
By service on Major Plato  
TAYLOR WILKINS Sheriff  
By Sachue D.S.

CASE NO. 9863

FRIENDLY CREDIT UNION, a corp.

Plaintiff

vs:

MAJOR J. PLATO,

Defendant

MOTION & ORDER TO SHOW CAUSE

Sheriff claims 10 miles at

Ten Cents per mile Total \$ 1.00

TAYLOR WILKINS, Sheriff

BY Sachue  
DEPUTY SHERIFF

John L. Cole  
1117- 14th St. S., Birmingham

JOHN L. COLE  
ATTORNEY AT LAW  
UNIVERSITY CREDIT UNION BUILDING  
1117 - 14TH STREET, SOUTH  
BIRMINGHAM, ALABAMA 35205

TELEPHONE 933-2100  
February 6, 1974

9863

STANLEY A. CASH  
(ASSOCIATE)

Judge of the Circuit Court  
Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama 36507

Re: The enclosed Motion & Order to Show Cause

Dear Sir:

Could you please have this Motion & Order to Show Cause  
set on Friday, February 22, 1974.

Thank you for your cooperation in this matter.

Sincerely yours,

*John L. Cole*  
John L. Cole,  
Attorney at Law

JLC/wh

Judge  
Note  
Date