

WRIT OF DISCOVERY

TO RALPH STYRON

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 RALPH STYRON 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 12th DAY OF April, 19 73.

Eunice 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 RALPH STYRON AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

Eunice B. Blackmon
CLERK

FILED
APR 12 1973
EUNICE B. BLACKMON
CLERK

Received 12 day of April 1973
and on 10 day of May 1973
I served a copy of the within Notice of Disc.
on Ralph Styron

By service on _____

TAYLOR WILKINS, Sheriff
[Signature] D.S.

77
Toll Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

CASE #10,547

KAISER AGRICULTURAL CHEMICALS,
Plaintiff

VS:

RALPH STYRON,
Defendant

NOTICE OF DISCOVERY OF ASSETS

Deft. Address: Rt. 2
Foley, Alabama

FILED

APR 12 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

Kenneth Cooper,
Attorney for Plaintiff

RECEIVED

APR 12 1973

TAYLOR WILKINS
SHERIFF

KAISER AGRICULTURAL CHEMICALS

Plaintiff

-VS-

RALPH STYRON

Defendant

§

§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,547

DECREE CITING JUDGMENT DEBTOR FOR

CONTEMPT

Upon consideration of the petition filed herein by the above-named plaintiff on the 18th day of July, 1973, praying that the said defendant be cited for contempt, it is

ORDERED, ADJUDGED and DECREED by the Court that the said Ralph Styron do be and appear before this Court on the 1st day of August 1973, at 10:00 ~~A~~ M. o'clock, and show cause, if any he has, 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, together with a copy of this decree, be forthwith served upon the said defendant by the Sheriff of Baldwin County, Alabama.

Dated this 20th day of July, 1973.

Jeffery M. Washburn
CIRCUIT JUDGE

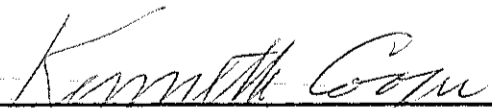
KAISER, AGRICULTURAL CHEMICALS	§	IN THE CIRCUIT COURT OF
Plaintiff	§	BALDWIN COUNTY, ALABAMA
-VS-	§	AT LAW
RALPH STYRON	§	CASE NO. 10,548
Defendant	§	

PETITION TO CITE DEFENDANT FOR
CONTEMPT

Comes now the plaintiff in above-styled cause and shows unto this Honorable Court that on, to-wit, the 12th day of April, 1973, a notice was issued out of this Honorable Court by the Clerk thereof requiring above named defendant to file a list of his assets as required by Section 903, Code of Alabama, Recompiled, 1958, as Amended; that said notice was duly and personally served upon the defendant on the 10th day of May, 1973; and that said defendant has wilfully refused to file such statement.

The Premises Considered, the plaintiff petitions that the said Ralph Styron be cited for contempt of Court and that he be required to appear before this Honorable Court, at a time and place to be fixed, to show cause, if any he has, why he should not be held in contempt of Court for wilfully refusing to file such statement of assets.

And your petitioner will every pray.


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

DATED:
STATE OF ALABAMA
BALDWIN COUNTY

I, the undersigned Kenneth Cooper, being first duly sworn, depose and say:

FILED

JUL 18 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

I am a resident citizen of Baldwin County, in the State of Alabama. I am the attorney for the Plaintiff in the foregoing Petition. I have read over the Petition, and the facts stated therein are true and correct according to my information, knowledge and belief.

Kenneth Cooper
KENNETH COOPER

Sworn to and subscribed before me this 17 day of July, 1973.

My Commission Expires:
1-4-1976

James H. Lindsey
NOTARY PUBLIC
STATE OF ALABAMA

JAMES H. LINDSEY, NOTARY PUBLIC
STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES JAN. 4, 1976

FILED

JUL 18 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

#10,547

5042ue

Kaiser Agricultural
Chemicals

vs:

Ralph Styron
FOL 67

Petition + Decree Citing
Judgment Debtor for
Contempt

Kenneth Cooper,
Atty for Pltf.

RECEIVED

JUL 23 1973

Received 23 day of July 1973
and on 30 day of July 1973
I received a copy of the within petition + decree
on Ralph Styron
By service on Ralph Styron
TAYLOR, WILKINS, Sheriff
By Taylor D. S.

Sheriff claims 97 miles at 720
Ten Cents per mile Total 69.60
TAYLOR WILKINS, Sheriff
BY Taylor DEPUTY SHERIFF

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

Plaintiff,

VS.

RALPH STYRON,

Defendant,

VS.

EUNICE BLACKMON,

Garnishee.

*

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CASE NO: 10,547

FILED

MAY 14 1982

EUNICE B. BLACKMON CIRCUIT CLERK

ANSWER OF GARNISHEE

Comes now the Garnishee, Eunice Blackmon, Clerk of the Circuit Court of Baldwin County, Alabama and for Answer to the Writ of Garnishment heretofore served upon her, she says as follows:

That in her official capacity as Clerk of the Circuit Court of Baldwin County, Alabama, she is indebted to the Defendant, Ralph Styron in the amount of \$5588.53 being the remaining amount paid into Circuit Court as proceeds from a judicial sale of certain properties of the Defendant. That she will hold said sum of money pending any orders of the Circuit Court of Baldwin County, Alabama.

Eunice B. Blackmon
Eunice Blackmon
Clerk of the Circuit Court of
Baldwin County, Alabama

Sworn to and subscribed before me on this the 14 day of April, 1982.

Ellen M. Barbarow
Notary Public

WILKINS, BANKESTER & BILES, P.A.

ATTORNEYS AT LAW

P. O. BOX 1140

BAY MINETTE, ALABAMA 36507

TELEPHONE (205) 937-7024

TAYLOR D. WILKINS, JR.
CLAUDE E. BANKESTER
BAYLESS E. BILES

April 27, 1982

ROBERTSDALE OFFICE
CHICAGO STREET
P. O. BOX 562
ROBERTSDALE, ALABAMA 36567
TELEPHONE (205) 947-2244

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

Re: Blaylock vs. Styron
Case No: 10,547

Dear Mrs. Blackmon:

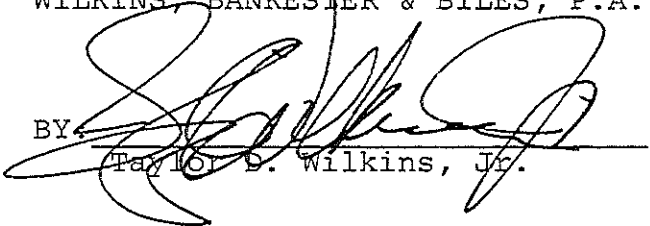
Would you please issue an execution on the judgment with
reference to the above styled cause?

Thank you for your cooperation.

Very truly yours,

WILKINS, BANKESTER & BILES, P.A.

BY:


Taylor D. Wilkins, Jr.

TDWJr:sh
Encl.

FILED

APR 27 1982

EUNICE B. BLACKMON CIRCUIT
CLERK

*Hold until Eunice
talks to Mr. Wilkins*

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

Plaintiff,

VS.

RALPH STYRON,

Defendant,

VS.

EUNICE BLACKMON,

Garnishee.

*

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CASE NO: 10,547

FILED

MAY 5 1982

EUNICE B. BLACKMON CIRCUIT CLERK

PETITION TO REQUIRE PAYMENT
OF FUNDS HELD BY GARNISHEE

Comes now the Petitioner, Walter Blaylock, by and through his attorney, Taylor D. Wilkins, Jr., and shows unto the Court that he has caused to be served upon Eunice Blackmon, Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Garnishment in this cause. That the Clerk of the Circuit Court of Baldwin County, Alabama has Answered that she has in her possession the sum of \$ 5588.53 which was paid to her as proceeds from a judicial sale by the Sheriff of Baldwin County, Alabama and that she is indebted to the Defendant, Ralph Styron, by law, in such amount.

WHEREFORE, the said Walter Blaylock petitions this Court for an Order requiring the Garnishee to pay these funds over to Walter Blaylock who is the Assignee of a Judgment in favor of Kaiser Agricultural Chemical Company and against Ralph Styron.

WILKINS, BANKESTER & EILES, P.A.

BY: 

Taylor D. Wilkins, Jr.

Attorney for Petitioner

Post Office Box 1140

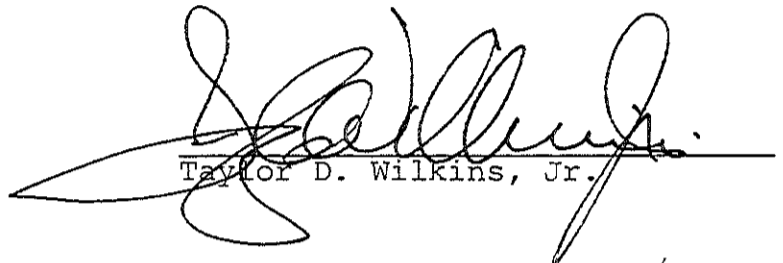
Bay Minette, Alabama 36507

STATE OF ALABAMA

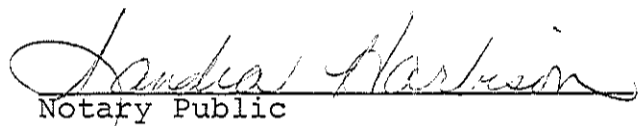
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Taylor D. Wilkins, Jr., who being by me first duly and legally sworn, did depose and say as follows:

That I am the attorney of record for the Petitioner, Walter Blaylock, that I have read the above and foregoing Petition, and I am informed and believe and upon such information and belief allege that the matters and facts alleged therein are true and correct.


Taylor D. Wilkins, Jr.

Sworn to and subscribed before me on this the 23rd day of April, 1982.


Notary Public

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

*

Plaintiff,

*

VS.

*

RALPH STYRON,

*

Defendant,

*

CASE NO: 10,547

VS.

*

EUNICE BLACKMON,

*

Garnishee.

*

ANSWER OF GARNISHEE

Comes now the Garnishee, Eunice Blackmon, Clerk of the Circuit Court of Baldwin County, Alabama and for Answer to the Writ of Garnishment heretofore served upon her, she says as follows:

That in her official capacity as Clerk of the Circuit Court of Baldwin County, Alabama, she is indebted to the Defendant, Ralph Styron in the amount of \$_____ being the remaining amount paid into Circuit Court as proceeds from a judicial sale of certain properties of the Defendant. That she will hold said sum of money pending any orders of the Circuit Court of Baldwin County, Alabama.

Eunice Blackmon
Clerk of the Circuit Court of
Baldwin County, Alabama

Sworn to and subscribed before me on this the ____ day of
April, 1982.

Notary Public

PROCESS OF GARNISHMENT
Title 7, Sec. 997-999

Case Number

10,547 1/2

ID YR Number

THE Circuit COURT OF Baldwin COUNTYPlaintiff: KAISER AGRICULTURAL CHEMICAL
Attorney: TAYLOR D. WILKINS, JR.Defendant: RALPH STYRON
Attorney:

Judgment Date: 10/3/72

Judgment/Decree: 5677.57

Garnishee: Eunice Blackmon
Address: Baldwin County Courthouse
Bay Minette, Alabama 36507

Costs 68.10

Other

TOTAL \$5,745.67

AFFIDAVIT

I make oath that I have obtained the above judgment and believe the named garnishee is indebted to the defendant or has effects of the defendant under his control. I believe that a process of garnishment against the said garnishee is necessary to obtain satisfaction of the judgment.

This garnishment is/is not subject to restrictions of Section II, Act No. 2052, Alabama Law, 1971, Title 5, Chap. 14, Code of Alabama (Minicode).

Sworn and Signed Before Me This

23rd Day of April, 19 82

MAY 5 1982

Notary Public/Clerk/Register

(Signature)

EUNICE B. BLACKMON

(Signature)

(Signature)

WRIT OF GARNISHMENT

TO ANY LAWFUL OFFICER OF THE STATE OF ALABAMA:

You are hereby commanded to serve Process of Garnishment on Garnishee Eunice Blackmon

and a copy on defendant

Ralph Styron, Route 2, Foley, AL

NOTICE TO GARNISHEE: YOU ARE THE GARNISHEE IN THE ABOVE ACTION. You must complete and file the enclosed answer within thirty days from service of this process. You must answer

- (1) as to whether you are or were indebted to the defendant at the time you received this process, or when you make your answer, or during the intervening time, or
- (2) whether you will be indebted to him in the future by existing contract or
- (3) whether by existing contract you are liable to him for the delivery of personal property or for the payment of money.

If you fail to file an answer, the plaintiff can proceed for judgment against you for the amount of his claim plus costs.

Mailing the notarized answer form to the clerk of the court at the address below constitutes making a proper appearance in the court.

You are further commanded to RETAIN OF WAGES, SALARY OR OTHER COMPENSATION in accordance with instructions contained in the paragraph (X) below:

_____ 25 per cent of disposable earnings, or the amount by which his disposable earnings exceed thirty times the Federal minimum hourly wage per week, whichever is less,

OR

_____ 20 per cent of disposable earnings, or the amount by which his disposable earnings exceed fifty times the Federal minimum hourly wage per week, whichever is less.

DUE TO BECOME DUE TO SAID DEFENDANT, DURING SUCH PERIOD OF TIME AS NECESSARY TO ACCUMULATE THE SUM OF \$5588.53 (judgment and cost), and when SAID SUM IS ACCUMULATED, SAID GARNISHEE IS REQUIRED BY LAW TO PAY SAME INTO COURT IMMEDIATELY, AND IF EMPLOYMENT OF DEFENDANT IS TERMINATED BEFORE SAID SUM IS ACCUMULATED, THEN GARNISHEE IS REQUIRED BY LAW TO REPORT TERMINATION AND PAY INTO COURT WITHIN 15 DAYS AFTER TERMINATION, ALL SUMS WITHHELD.

Issued May 5, 19 82

Clerk/Register

(Signature)

(Deputy Clerk Initials)

This process executed by serving a copy on _____, Garnishee this _____ day of _____, 19 _____ by _____ Defendant served this _____ day of _____, 19 _____ by _____

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THOMAS H. BENTON, SHERIFF

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Notiz

10547 1/2
RECEIVED

MAY 11 1982

Writ + Native

PROCESS OF GARNISHMENT
Title 7, Sec. 997-999

Case Number

10,547 1/2
ID YR NumberTHE Circuit COURT OF Baldwin COUNTYPlaintiff: KAISER AGRICULTURAL CHEMICAL
Attorney: TAYLOR D. WILKINS, JR.Defendant: RALPH STYRON
Attorney:

Judgment Date: 10/3/72

Judgment/Decree: 5677.57

Garnishee: Eunice Blackmon
Address: Baldwin County Courthouse
Bay Minette, Alabama 36507

Costs 68.10

Other

TOTAL \$5,745.67

AFFIDAVIT

I make oath that I have obtained the above judgment and believe the named garnishee is indebted to the defendant or has effects of the defendant under his control. I believe that a process of garnishment against the said garnishee is necessary to obtain satisfaction of the judgment.

This garnishment is/is not subject to restrictions of Section II, Act No. 2052, Alabama Law, 1971, Title 5, Chap. 14, Code of Alabama (Minicode).

Sworn and Signed Before Me This
23rd Day of April, 19 82

MAY 5 1982

Notary Public/Clerk/Register (Signature)

EUNICE B. BLACKMON

(Signature)

WRIT OF GARNISHMENT

TO ANY LAWFUL OFFICER OF THE STATE OF ALABAMA:

You are hereby commanded to serve Process of Garnishment on Garnishee Eunice Blackmon
and a copy on defendant Ralph Styron

NOTICE TO GARNISHEE: YOU ARE THE GARNISHEE IN THE ABOVE ACTION. You must complete and file the enclosed answer within thirty days from service of this process. You must answer

- (1) as to whether you are or were indebted to the defendant at the time you received this process, or when you make your answer, or during the intervening time, or
- (2) whether you will be indebted to him in the future by existing contract or
- (3) whether by existing contract you are liable to him for the delivery of personal property or for the payment of money.

If you fail to file an answer, the plaintiff can proceed for judgment against you for the amount of his claim plus costs.

Mailing the notarized answer form to the clerk of the court at the address below constitutes making a proper appearance in the court.

You are further commanded to RETAIN OF WAGES, SALARY OR OTHER COMPENSATION in accordance with instructions contained in the paragraph (X) below:

_____ 25 per cent of disposable earnings, or the amount by which his disposable earnings exceed thirty times the Federal minimum hourly wage per week, whichever is less,

OR

_____ 20 per cent of disposable earnings, or the amount by which his disposable earnings exceed fifty times the Federal minimum hourly wage per week, whichever is less,

DUE TO BECOME DUE TO SAID DEFENDANT, DURING SUCH PERIOD OF TIME AS NECESSARY TO ACCUMULATE THE SUM OF \$5588.53 (judgment and cost), and when SAID SUM IS ACCUMULATED, SAID GARNISHEE IS REQUIRED BY LAW TO PAY SAME INTO COURT IMMEDIATELY, AND IF EMPLOYMENT OF DEFENDANT IS TERMINATED BEFORE SAID SUM IS ACCUMULATED, THEN GARNISHEE IS REQUIRED BY LAW TO REPORT TERMINATION AND PAY INTO COURT WITHIN 15 DAYS AFTER TERMINATION, ALL SUMS WITHHELD.

Issued May 5, 19 82

Clerk/Register (Signature)

(Deputy Clerk Initials)

This process executed by serving a copy on _____, Garnishee this
day of _____, 19 _____ by _____ Defendant served
this day of _____, 19 _____ by _____

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

Plaintiff,

VS.

RALPH STYRON,

Defendant,

VS.

EUNICE BLACKMON,

Garnishee.

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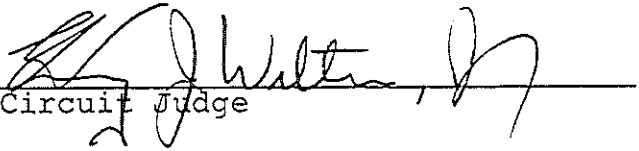
CASE NO: 10,547

ORDER

The Court having been presented with the foregoing Motion of the Plaintiff requesting an order of this Court directed to Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee, and the Court having considered the same and finding the Plaintiff is entitled to the relief asked for in his Motion; it is

ORDERED, ADJUDGED AND DECREED that Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee, pay to the Plaintiff, Walter Blaylock, the funds held in her possession in this cause in the amount of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars.

DONE and ORDERED this the 18 day of June, 1982.


Circuit Judge

Mr. Ralph Styron
P.O. Box 595
Jaley. Al.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

Plaintiff,

VS.

RALPH STYRON,

Defendant,

VS.

EUNICE BLACKMON,

Garnishee.

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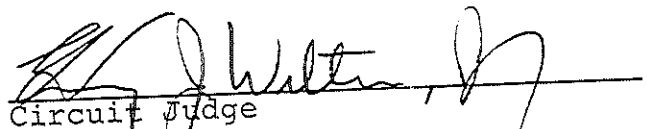
CASE NO: 10,547

ORDER

The Court having been presented with the foregoing Motion of the Plaintiff requesting an order of this Court directed to Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee, and the Court having considered the same and finding the Plaintiff is entitled to the relief asked for in his Motion; it is

ORDERED, ADJUDGED AND DECREED that Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee, pay to the Plaintiff, Walter Blaylock, the funds held in her possession in this cause in the amount of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars.

DONE and ORDERED this the 18 day of June, 1982.


Circuit Judge

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

*

Plaintiff,

*

VS.

*

RALPH STYRON,

*

CASE NO: 10,547

Defendant,

*

VS.

*

EUNICE BLACKMON,

*

Garnishee.

*

MOTION

Comes now the Plaintiff in this cause and shows unto Your Honor as follows:

1. The Plaintiff has caused a garnishment to issue in this cause against the Defendant, Ralph Styron, and has caused service to be perfected on Eunice Blackmon, Circuit Court of Baldwin County, Alabama, Garnishee.

2. The Garnishee has answered that she is indebted to the Defendant in the sum of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars and is holding said money pending further orders of this Court.

3. The Defendant has failed to answer the garnishment and a default was taken against him on the 17th day of June, 1982.

WHEREFORE, the Plaintiff moves the Court for an order directing Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee to pay said funds in the amount of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars to the Plaintiff to be applied on his judgment.

Respectfully submitted,

WILKINS, BANKESTER & BILES, P.A.

BY: 

Taylor D. Wilkins, Jr.

Attorney for Plaintiff

Post Office Box 1140

Bay Minette, AL 36507

FILED

JUN 18 1982

EUNICE B. BLACKMON CIRCUIT CLERK

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

WALTER BLAYLOCK,

Plaintiff,

VS.

RALPH STYRON,

Defendant,

VS.

EUNICE BLACKMON,

Garnishee.

*

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CASE NO: 10,547

MOTION

Comes now the Plaintiff in this cause and shows unto Your Honor as follows:

1. The Plaintiff has caused a garnishment to issue in this cause against the Defendant, Ralph Styron, and has caused service to be perfected on Eunice Blackmon, Circuit Court of Baldwin County, Alabama, Garnishee.

2. The Garnishee has answered that she is indebted to the Defendant in the sum of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars and is holding said money pending further orders of this Court.

3. The Defendant has failed to answer the garnishment and a default was taken against him on the 17th day of June, 1982.

WHEREFORE, the Plaintiff moves the Court for an order directing Eunice Blackmon, Circuit Clerk of Baldwin County, Alabama, Garnishee to pay said funds in the amount of Five Thousand Five Hundred Eighty-eight and 53/100 (\$5,588.53) Dollars to the Plaintiff to be applied on his judgment.

Respectfully submitted,

WILKINS, BANKESTER & BILES, P.A.

BY:  Taylor D. Wilkins, Jr.

Attorney for Plaintiff

Post Office Box 1140

Bay Minette, AL 36507

FILED

JUN 18 1982

EUNICE B. BLACKMON CIRCUIT CLERK

State of Alabama
Supreme Court
Dept. of Court Mgmt.

APPLICATION, AFFIDAVIT, AND ENTRY OF DEFAULT

Case Number

Form SC-C-17 1-77

10,547 1/2
ID YR Number

IN THE _____ CIRCUIT _____ COURT OF _____ BALDWIN _____ COUNTY

Plaintiff KAISER AGRICULTURAL CHEMICAL vs Defendant RALPH STYRON

An entry of default against the defendant Ralph Styron in the above case is requested for his failure to plead, answer, or otherwise defend.

Signed: _____

The affiant Taylor D. Wilkins, Jr., being duly sworn, says:

1. That he has personal knowledge of the facts set forth in this affidavit.
2. That the defendant was served with a copy of the Statement of Claim on the 17 day of May, 19 82
3. That more than 30 days have elapsed since the defendant was served with a copy of the Statement of Claim.
4. That the defendant has failed to answer or otherwise defend himself against the plaintiff's claim.
5. That this affidavit is executed by the affiant in accordance with Rule 55 (a) of the Alabama rules of Civil Procedure, for the purpose of enabling the plaintiff to obtain an entry of default against the defendant, for his failure to answer or otherwise defend himself against the plaintiff's claim.
6. That the defendant is a resident of the above county, is not an infant or an incompetent person, and there has been no violation of Title 5, CH 14, Code of Alabama.
7. That the amount of money due by the defendant to the plaintiff in this case is ☐ to be determined by court, ☐ the same of \$ 5,588.53, which is to be determined by the clerk and composed of the following:

The sum of \$ _____, which sum includes a principal balance of \$ _____, \$ _____ Interest, and an attorney fee of \$ _____, which affiant states to be a reasonable attorney's fee for services rendered by affiant in this cause.

Affiant

Taylor D. Wilkins, Jr.

Sworn To and Signed before Me This 17 Day
Of June, 19 82.

Andrea Harrison
NOTARY/CLERK

Default entered against defendant this _____ day of _____, 19 ____.

Clerk

KAISER AGRICULTURAL CHEMICALS	Ø	
Plaintiff	Ø	IN THE CIRCUIT COURT OF
-VS-	Ø	BALDWIN COUNTY, ALABAMA
JOHN S. JOHNSON RALPH STYRON	Ø	AT LAW
Defendant	Ø	CASE NO. 10,548

REQUEST FOR DISCOVERY OF ASSETS
TO EUNICE B. BLACKMON, CLERK OF SAID COURT:

The Plaintiff herein having recovered on the third day of October, 1972, a judgment against the defendant in the above-styled cause for the sum of Five Thousand Six Hundred Sixty-seven and 57/100 (\$5,667.57) 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 Ralph Styron 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 Ralph Styron, 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 a 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 such liens, encumbrances or mortgages.

The said Ralph Styron resides at Foley, Alabama.

Dated this 4th day of April, 1973.

Kenneth Cooper

ATTORNEY FOR PLAINTIFF

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

FILED

APR 12 1973

EUNICE B. BLACKMON
CIRCUIT
CLERK

SUMMONS

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
CASE NO. _____
_____ TERM, 1972

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Gledis Peterson, 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 Gledis Peterson, Defendant, by Kaiser Agricultural Chemicals, Plaintiff.

Witness my hand this 15 day of August, 1972.

Eunice B. Blackmon,
CLERK

KAISER AGRICULTURAL CHEMICALS §
Plaintiff §
-VS- §
GLEDIS PETERSON §
Defendant §

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 10,548

COUNT ONE

The Plaintiff claims of the Defendant Four Thousand Two Hundred Thirty-Two 81/100 (\$4,232.81) Dollars, due from him on account on the 13th day of October, 1970, which sum of money, with interest thereon, is still due.

COUNT TWO

The Plaintiff claims of the Defendant Four Thousand Two Hundred Thirty-Two 81/100 (\$4,232.81) Dollars, on account stated between the Plaintiff and the Defendant on the 13th day of October, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant Four Thousand Two Hundred Thirty-Two $\$1/100$ (\$4,232.81) Dollars, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 13th day of October, 1970, which sum of money, with interest thereon, is still unpaid.

Attached hereto is an itemized and verified copy of the account upon which this suit is based.


ATTORNEY FOR PLAINTIFF

FILED

AUG 15 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

KAISER
AGRICULTURAL
CHEMICALS

IN ACCOUNT WITH
PENSACOLA DISTRICT OFFICE
PENSACOLA, FLORIDA 32502

NAME Cloda Roberts

ADDRESS Lealey, Ala.

DATE DELIVERED	TICKET NUMBER	TOTAL BAGS	SIZE BAGS	TONS	GRADE	PRICE	DEBIT	DATE OF PAYMENT	CREDIT	BALANCE
Balance	Forwarded									4047 91
1-25-70	Finance Charge						40 00			
2-25-70	Finance Charge						40 00			
3-25-70	Finance Charge						40 00			
4-25-70	Finance Charge						40 00			
5-25-70	Finance Charge						40 00			
6-25-70	Finance Charge						40 00			
7-25-70	Finance Charge						42 50			
8-25-70	Finance Charge						42 50			
9-29-70	Finance Charge						42 50			
10-29-70	Finance Charge						37 50			
								1-15-71	500	
11-20-70	Finance Charge						37 50			
12-30-70	Finance Charge						39 93			4033 11
1-3-71	Finance Charge						39 93			
2-23-71	Finance Charge						39 93			
3-23-71	Finance Charge						39 93			
4-30-71	Finance Charge						39 93			
5-20-71	Finance Charge						39 93			\$ 4232 81
<p>I James W. Mann, Regional Credit Manager, hereby certify that I have personal knowledge of the records of Kaiser Agricultural Chemicals, Division of Kaiser Aluminum & Chemical Sales, Inc. and that the above account is true and correct and is past due and unpaid.</p>										
<p>Sworn and subscribed to this 18th of NOVEMBER, 1971.</p>										
<p><u>Araldino A. Alverson</u> NOTARY PUBLIC</p>										

KAISER
AGRICULTURAL
CHEMICALS

IN ACCOUNT WITH
PENSACOLA DISTRICT OFFICE
PENSACOLA, FLORIDA 32502

NAME Olivia Robinson

ADDRESS Lowry, Ala.

DATE DELIVERED	TICKET NUMBER	TOTAL BAGS	SIZE BAGS	TONS	GRADE	PRICE	DEBIT	DATE OF PAYMENT	CREDIT	BALANCE
1-19-68	1303	300	100	15.00	11-12-12 T	48.00	144.00			
1-22-68	1336	300	100	15.00	11-12-12 T	48.00	144.00			
1-29-68	1410	300	B	15.00	11-12-12 T	50.00	150.00			
1-31-68	1400	300	B	15.00	11-12-12 T	45.00	135.00			
1-31-68	1498	300	B	15.00	11-12-12 T	50.00	150.00			
2-1-68	1099	Correct	B 1100		11-12-12 T		161.00			
2-5-68	1513	300	B	15.00	11-12-12 T	49.00	147.00			
2-7-68	1606	300	B	15.00	11-12-12 T	50.00	150.00			
2-9-68	1715	300	B	15.00	11-12-12 T	50.00	150.00			
3-3-68	2201	300	B	15.00	10-10-10 T	59.00	177.00			
3-11-68	2552	300	B	15.00	10-10-10 T	59.00	177.00			
3-11-68	2612	300	B	15.00	10-10-10 T	59.00	177.00			
3-12-68	2950	110	9A		Eptan	17.25	1897.00			
3-15-68	2152	300	B	15.00	10-10-10 T	59.00	177.00			
3-18-68	2058	300	B	15.00	10-10-10 T	59.00	177.00			
3-19-68	2849	300	B	15.00	10-10-10 T	59.00	177.00			
3-22-68	3052	20	gal		Eptan	17.25	345.00			
								4-18-68	with 25	
8-2-68	Finance	Change					1.11			
9-24-68	Finance	Change					1.11			
10-22-68	Finance	Change					1.11			
11-25-68	Finance	Change					1.11			
12-26-68	Finance	Change					1.11			
1-22-69	Finance	Change					1.11			
2-21-69	Finance	Change					1.11			
3-21-69	Finance	Change					1.11			
4-28-69	Finance	Change					1.11			
5-26-69	Finance	Change					1.11			
6-25-69	Finance	Change					1.11			
								6-29-69	300.00	
7-28-69	Finance	Change					3.45			
8-25-69	Finance	Change					3.45			
9-25-69	Finance	Change					3.45			
10-29-69	Finance	Change					3.45			
11-26-69	Finance	Change					3.45			
12-26-69	Finance	Change					3.45			

SUMMONS

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
CASE NO. _____
_____ TERM, 1972

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Cledis Peterson, 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 Cledis Peterson, Defendant, by Kaiser Agricultural Chemicals, Plaintiff.

Witness my hand this 15 day of August, 1972.

Emmie B. Blackburn,
CLERK

KAISER AGRICULTURAL CHEMICALS	§	IN THE CIRCUIT COURT OF
		BALDWIN COUNTY, ALABAMA
Plaintiff	§	
-VS-	§	AT LAW
CLEDIS PETERSON	§	CASE NO. <u>10,548</u>
Defendant	§	

COUNT ONE

The Plaintiff claims of the Defendant Four Thousand Two Hundred Thirty-Two 81/100 (\$4,232.81) Dollars, due from him on account on the 13th day of October, 1970, which sum of money, with interest thereon, is still due.


COUNT TWO

The Plaintiff claims of the Defendant Four Thousand Two Hundred Thirty-Two 81/100 (\$4,232.81) Dollars, on account stated between the Plaintiff and the Defendant on the 13th day of October, 1970, which sum of money, with interest thereon, is still unpaid.

COUNT THREE

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Attached hereto is an itemized and verified copy of the account upon which this suit is based.


ATTORNEY FOR PLAINTIFF

FILED

AUG 15 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

KAISER
AGRICULTURAL
CHEMICALS

IN ACCOUNT WITH
PENSACOLA DISTRICT OFFICE
PENSACOLA, FLORIDA 32502

NAME Cledis Peterson

ADDRESS Loxley, Ala.

DATE DELIVERED	TICKET NUMBER	TOTAL BAGS	SIZE BAGS	TONS	GRADE	PRICE	DEBIT	DATE OF PAYMENT	CREDIT	BALANCE
Balance	Forward									4047 91
1-25-70	Finance Charge						4047			
2-25-70	Finance Charge						4047			
3-25-70	Finance Charge						4047			
4-25-70	Finance Charge						4047			
5-25-70	Finance Charge						4047			
6-26-70	Finance Charge						4047			
7-26-70	Finance Charge						4250			
8-26-70	Finance Charge						4250			
9-29-70	Finance Charge						4250			
10-29-70	Finance Charge						3750			
								10-13-70	500.00	
11-30-70	Finance Charge						3750			
12-30-70	Finance Charge						3993			4033 16
1-30-71	Finance Charge						3993			
2-28-71	Finance Charge						3993			
3-30-71	Finance Charge						3993			
4-30-71	Finance Charge						3993			
5-30-71	Finance Charge						3993			\$ 4232 81
<p>I James W. Mann, Regional Credit Manager, hereby certify that I have personal knowledge of the records of Kaiser Agricultural Chemicals, Division of Kaiser Aluminum & Chemical Sales, Inc. and that the above account is true and correct and is past due and unpaid.</p> <p>Sworn and subscribed to this 18th of NOVEMBER, 1971.</p> <p><i>James W. Mann</i> JAMES W. MANN</p> <p><i>Shiradine A. Alverson</i> NOTARY PUBLIC</p>										

KAISER
AGRICULTURAL
CHEMICALS

IN ACCOUNT WITH
PENSACOLA DISTRICT OFFICE
PENSACOLA, FLORIDA 32502

NAME Cledis Peterson

ADDRESS Loxley, Ala.

DATE DELIVERED	TICKET NUMBER	TOTAL BAGS	SIZE BAGS	TONS	GRADE	PRICE	DEBIT	DATE OF PAYMENT	CREDIT	BALANCE
1-19-68	1303	300	100	15.00	4-12-12 T	48.00	120.00			
1-23-68	1336	300	100	15.00	4-12-12 T	48.00	120.00			
1-29-68	1410	300	B	15.00	4-12-12 T	50.00	150.00			
1-26-68	1400	300	B	15.00	4-12-12 T	45.50	136.50			
1-31-68	1484	300	B	15.00	4-12-12 T	50.00	150.00			
2-1-68	1499	Correct Billing low-B 1400					61.50			
2-5-68	1563	300	B	15.00	4-12-12 T	47.50	142.50			
2-7-68	1646	300	B	15.00	4-12-12 T	50.00	150.00			
2-9-68	1715	300	B	15.00	4-12-12 T	50.00	150.00			
3-6-68	2341	300	B	15.00	10-10-10 T	59.50	892.50			
3-11-68	2552	300	B	15.00	10-10-10 T	59.50	892.50			
3-11-68	2612	300	B	15.00	10-10-10 T	59.50	892.50			
3-18-68	2750	40	gal.		Eptam	17.25	690.00			
3-15-68	2658	300	B	15.00	10-10-10 T	59.50	892.50			
3-18-68	2758	300	B	15.00	10-10-10 T	59.50	892.50			
3-19-68	2848	300	B	15.00	10-10-10 T	59.50	892.50			
3-22-68	3052	20	gal.		Eptam	17.25	345.00			
								7-19-68	1646.25	
8-8-68	Finance	Charge					61.46			
9-24-68	Finance	Charge					61.46			
10-22-68	Finance	Charge					61.46			
11-25-68	Finance	Charge					61.46			
12-26-68	Finance	Charge					61.46			
1-22-69	Finance	Charge					64.53			
2-24-69	Finance	Charge					64.53			
3-21-69	Finance	Charge					64.53			
4-28-69	Finance	Charge					64.53			
5-26-69	Finance	Charge					64.53			
6-25-69	Finance	Charge					64.53			
								6-27-69	3000.00	
7-28-69	Finance	Charge					34.53			
8-25-69	Finance	Charge					34.53			
9-25-69	Finance	Charge					34.53			
10-27-69	Finance	Charge					34.53			
11-26-69	Finance	Charge					34.53			
12-26-69	Finance	Charge					34.53			4047.91

RECEIVED

807 13 1972

TAYLOR WILKINS

Case No. 10,548

Serve:

Cledis Peterson
Loxley, Alabama

KAISER AGRICULTURAL
CHEMICALS

Plaintiff

-VS-

CLEDIS PETERSON

Defendant

AUG 15 1972

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

RECEIVED

AUG 1 1972

ATTORNEY FOR PLAINTIFF

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

10,548

June 13

Received 13 day of June 1972

and on day of 19

I served a copy of the within on Cledis Peterson

By service on

June 13

TAYLOR WILKINS, Sheriff

By

Taylor Wilkins, Sheriff

By Brown Deputy Sheriff

RECEIVED

JUN 12 1973

TAYLOR WILKINS
SHERIFF

Returned 16 day of Aug. 1972
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
Deputy Sheriff
Returned 8 day of Jan 1973
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By JMB:nd Deputy Sheriff

KENNETH COOPER
ATTORNEY AT LAW
109 EAST 1ST STREET
P. O. BOX 1000
BAY MINETTE, ALABAMA 36507
TELEPHONE (205) 937-7412

June 11, 1973

Mrs. Eunice Blackmon
Register, Equity Division
Baldwin County Circuit Court
Bay Minette, Alabama 36507

RE: Kaiser Agricultural Chemicals vs.
Cledis Peterson 10,548

Dear Mrs. Blackmon:

We now have a current mailing address on Cledis Peterson.
Please notify the Sheriff's office so the Summons and Complaint
may be served on him. His new address is Post Office Box 59,
Loxley, Alabama.

Sincerely,

Mrs. J. Rushing
(Mrs.) Jackie Rushing
Secretary to Mr. Cooper

Mr. Cooper
jlr
6-13-73
not in
file in
N.C.
County