

COMPLAINT

5218

PILGRIM COASTAL MOTORS

PLAINTIFF

VS

GLENN STEWART

DEFENDANT

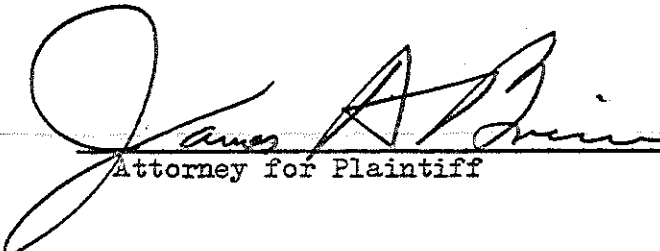
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. _____

I

The Plaintiff claims of the Defendant the sum of Two Hundred Four and 91/100 (\$204.91) Dollars, due from him on account, to-wit: the 28th day of February, 1961, which sum of money, with interest thereon, is still unpaid.

II

The Plaintiff claims of the defendant Two Hundred Four and 91/100 (\$204.91) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 28th day of February, 1961, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Glenn Moyer, a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 28th day of February, 1961, and due at present.

The Defendant resides at Foley, Alabama

FILED
JUL 26 1962
ALICE I. DUCK, CLERK
REGISTER

PILGRIM COASTAL MOTORS

FOLEY, ALABAMA



Glenor Stewart

Galley, Ala.

4

DATE	DETAIL	DEBITS	CREDITS	BALANCE
10/20/59	Inv. # 13454	4.97		4.97
11/4/59	R.O. # 5017	3.43		8.40
11/4/59	R.O. # 4643	154.01		162.44
12/13/59	Inv. # 14183	1.50		163.94
12/13/59	Inv. # 869	21.24		185.18
1/12/60	Inv. # 1232	.53		185.71
1/20/60	Inv. # 1254	1.22		186.93
1/21/60	Inv. # 1365	17.98		204.91
11/30/60	Ret. Check	30.90		2.35.81
2/28/61	By cash - Ret. Chk.		30.90	204.91

AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me the undersigned Notary Public in and for said State and County, personally appeared Glenn Moyer, who being by me first duly sworn, deposes and says that he is Managing Partner of Pilgrim Coastal Motors; that the annexed statement of account of Pilgrim Coastal Motors against Glenn Stewart is just, true and correct; and that there is now due on said account the sum of Two Hundred Four and 91/100 (\$204.91) Dollars.

Glenn Moyer
Glenn Moyer

Sworn to and subscribed before me this 20th day of July 1962.

Virgie E. Johnson
Notary Public

Notary Public, Alabama State at Large
My Commission Expires Oct. 10, 1964

Received 26 day of July, 1962
and on _____ day of _____ 19____
I served a copy of the within _____
on Glenn Stewart

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Glenn Stewart

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

Glenn Stewart, Defendant.....

by Pilgrim Coastal Motors

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

Witness my hand this 26 day of June 1962

Reice J. Hensch, Clerk

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**Pilgrim Coastal Motors

Plaintiffs

vs.

Glenn Stewart

Defendants

Summons and Complaint**FILED**

Filed

19

JUL 26 1962

J. DUCK, CLERK
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama**Received In Office**

, 19

Sheriff.

I have executed this summons

this

by leaving a copy with

1962Glenn Stewart

Sheriff claims

miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

James A. Brice

Sheriff.

James A. Brice

Deputy Sheriff.

James A. Brice

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

September 7, 1962

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

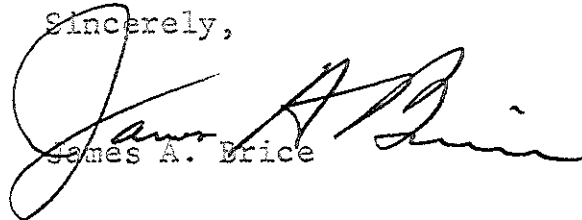
Re: Pilgrim Coastal Motors
Vs: Glenn Stewart
At Law No. 5218

Dear Mrs. Duck:

Kindly place the above file before Judge Hall for judgment by default for plaintiff for \$204.91 on account, plus \$24.00 for interest, a total of \$228.91.

Please send me a certificate of judgment. Thank you.

Sincerely,


James A. Brice

JAB:j

STATEMENT

LAW OFFICE OF
JAMES A. BRICE

FOLEY, ALABAMA
July 25, 1962

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Enclosure: Suit--Pilgrim Coastal Motors vs Glenn Stewart

"A LAWYER'S TIME AND ADVICE ARE HIS STOCK IN TRADE"
—A. LINCOLN