#### COMPLAINT



PILGRIM COASTAL MOTORS

PLAINTIFF

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

VS

GLENN STEWART

DEFENDANT

1

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.

TT

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

## PILGRIM COASTAL MOTORS

P. O. BOX 1645 - WH 3-2951 & 61 FOLEY, ALABAMA







# Henn Stwart. Goley, ala.

anner anner anner 11 verse a en anticipi de la company		ger to have an	alanda bilin yeladi delemba bilinda se maani dele	
	DETAIL	OEBITS	CREDITS	BALANCE
10 120 15 g	manuscondinate la tetra la cita con a cata tan a canada cara cata cata cata cata cata cata cat	4.97	ZIIVE II ANIINSSAASSAAI ZAAZ VAARISAD AANIIANNA VARIININNAAS EN	naconstrumentalisismusimus etemperasiinis
11/4/59	accession della simulativa mundi bissioni di un mundi di un di	3.43		8.40
11/11/59	2.0 4 4643	154.04		162,44
12/3/59	and the state of t		SIAMBLEON COMMUNICATION AND CONTRACTOR	
12/13/59	Inn. # 869	21.24	e 11 gel geningen frenkyllis och stade i kale skallisti (1881–1881).	185,18
1/12/60	Inv. # 1232	.53		185.71
1	Inv. # 1354	y de austranças curros en los periodos acidentes acidentes.	on of deline and a commission of the action of the property of the commission of the	186.93
1/21/60	Inv. # 1365	17.98		204.91
11/30/60	Let weeks	30.90		23581
2/23/61	By Cache - Bit Sheim	MATERIAN AT EXCHINENT AND PROPERTY PROPERTY AND ADDRESS.	30.90	204.91
		yn y milwei wil milwid ar iddiai ar da ar iddiai a		ala halajunini a annun suuraa ka manan 1184-864 (1868). A
$\label{eq:continuity-interpolation} \text{Assume} Assume$			S.S. HESISARSSA INTIMESSA SORTIF SORS MILITARY (A.S.) AND AREAL	SAATSIINISSON ASSURANT, AMERIKAN JAMASAA JAMASAA ASSURANTIISSA ASSURANTIISSA ASSURANTIISSA ASSURANTIISSA ASSURA
				<sub>NAS</sub> ym <del>aun namunan ni dinisan</del> s
BUTTEREN TERMENTER TERMENTER FOR FOR THE ANALYSIS AND				

### 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

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

Virgie & Johnson Notary Public

Notary Public, Alabama State of Lerge My Commission Expires Oct. 10, 1984

Received Con and on I served a) copy	CEY Of management of according to the control of th	esimens Versionis
on Almi	n Sleivart	The second particular and second particular
By service on	TAYLOR WILKINS, She	eriff

The State of Alabama,	1	cuit Court, Baldwin	County
Baldwin County.	No		TERM, 19
TO ANY SHERIFF OF THE	STATE OF ALABA	MA	
You Are Commanded to Summon	Glenn Stewa	rt	
You Are Commanded to Summon			
to appear and plead, answer or de	nur, within thirty days	s from the service hereof,	to the complaint filed in
the Circuit Court of Baldwin Cour	nty, State of Alabama,	at Bay Minette, against	
Glenn Stev	vart		, Defendant
by	Pilgrim Coast	al Motors	
			, Plaintiff
Witness my hand this		,	
Withess my man to the same		Blice	LACIACAC, Clerk
f-1-11-6-			applications and the second se

No. 5718 Page	Professional and a second control of the sec		
STATE of ALABAMA  Baldwin County	Defendant lives at Foley, Alabama		
CIRCUIT COURT	Received In Office		
	, 19		
Pilgrim Coastal Motors Plaintiffs	Sheriff. I have executed this summons		
vs,	this		
Glenn Stewart Defendants			
Summons and Complaint  Filed	Glend line		
	Sheriff claims miles at Ten Cents per mile Total \$2.00 TAYLOR VILKINS, Sheriff BY DEPUTY SHERIFF		
James A. Brice Plaintiff's Attorney	Mayre Cloke. Sheriff.		
Defendant's Attorney	Deputy Sheriff.		

### 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.

Femes A. Brice

JAB:j

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