(5290)

SOUTHEASTERN GREYHOUND LINES, DIVISION OF THE GREYHOUND CORPORATION, A Corporation,

Plaintiff,

VS.

W. W. WILSON,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW.

Defendant.

## COMPLAINT

#### COUNT I

The Plaintiff claims of the Defendant TWO THOUSAND SIX HUNDRED FIFTY-ONE AND 08/100 (\$2,651.08) DOLLARS due by promissory note made by him on, to-wit, the 3rd day of January, 1962, and payable ONE HUNDRED DOLLARS (\$100.00) on the 15th day of February, 1962, and payments of ONE HUNDRED DOLLARS (\$100.00) per month to be made on the 15th of each month until the total indebtedness is paid. And Defendant, as part of the consideration in said note, agreed to pay a reasonable attorney's fee for the collection thereof in case suit should be brought for the collection thereof, which Plaintiff further claims in the sum of FIVE HUNDRED THIRTY AND 22/100 (\$530.22) DOLLARS, together with the interest on said note.

#### COUNT II

The Plaintiff claims of the Defendant TWO THOUSAND SIX HUNDRED FIFTY-ONE AND 08/100 (\$2,651.08) DOLLARS due by promissory note made by him on, to-wit, the 3rd day of January, 1962, due and payable on the 15th day of February, 1962. And Defendant, as part of the consideration in said note, agreed to pay a reasonable attorney's fee for the collection thereof in case suit should be brought for the collection thereof, which Plaintiff further claims in the sum of FIVE HUNDRED THIRTY AND 22/100 (\$530.22) DOLLARS, together with the interest on said note.

## COUNT III

The Plaintiff claims of the Defendant the sum of TWO THOUSAND SIX HUNDRED FIFTY-ONE AND 08/100 (\$2,651.08) DOLLARS due from him by account on, to-wit, the 29th day of December,

 1961, which sum of money with the interest thereon is still unpaid.

#### COUNT IV

The Plaintiff claims of the Defendant the sum of TWO THOUSAND SIX HUNDRED FIFTY-ONE AND 08/100 (\$2,651.08) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 3rd day of January, 1962, which sum of money with the interest thereon is still unpaid.

By service on.

-Page 2 of two pages-

# THE STATE OF ALABAMA,

BALDWIN COUNTY

	CIRCUIT	COURT,	BALI	WIN (	COUNTY
No					
	M			ΓERM,	19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

	2.5	W. W. Wilson	*	
200				
	24 			
		· ·	**	
<b>\</b>				
appear and plead ar	CUION ON JOHNS	Harris and the community of the communit		
appear and preac, an	iswer or demur,	within thirty days from the service hereof, to the	complaint 427-2	
		to the	complaint filed in	the
cuit Court of Baldwi	in County, State	of Alabama, at Bay Minette, against W. W.	DITT COM	
		willette, against	MTT1201/	
- 1				
			Defendant	
SOUTHEASTERN	V CREVENITATI		, Defendant	
SOUTHEASTERN	N GREYHOUNI	D LINES, DIVISION OF THE GREY	, Defendant_	
SOUTHEASTERN	N GREYHOUNI	D LINES, DIVISION OF THE GREY	, Defendant_	ORAT:
SOUTHEASTERN A Corpora	N GREYHOUNI	D LINES, DIVISION OF THE GREY	, Defendant_	ORAT:
SOUTHEASTERN A Corpora	N GREYHOUNI	D LINES, DIVISION OF THE GREY	, Defendant	ORAT:
ar corbona	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:
ar corbona	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:
a corbona	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:
a corbona	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:
a corbona	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:
SOUTHEASTERN  A Corpora	ition	D LINES, DIVISION OF THE GREY	HOUND CORPO	ORAT:

No. 5791) Page	Defendant lives at
THE STATE OF ALABAMA BALDWIN COUNTY	Foley, Alabama
	RECEIVED IN OFFICE
CIRCUIT COURT	
COHMUEACMEDN OPENHOUND TEXTS	, 19
SOUTHEASTERN GREYHOUND LINES, DIVISION OF GREYHOUND CORPORA	
TION, A Corporation,	, Sher
5	I have executed this summons
Plaintiffs	this, 19
Vs.	by leaving a copy with
	Towns a copy with
W. W. WILSON	
Defendants	
SUMMONS and COMPLAINT	
Filed 19	
SEP or 1862	
- it was to clerk	
ALIGY J. DUCK, CLERK	
	•
E. G. Rickarby	
Attorney at Law	
P. O. Box 71 Fairhope, Alabama	
Plaintiff's Attorney	
	Sheri
Defendantly Atta	
Defendant's Attorney	Deputy Sheri

#### E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA

September 19, 1962

Mrs. Alice Duck Clerk of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

Re: Southeastern Greyhound Lines, Division of The Greyhound Corporation, A Corporation

Vs: W. W. Wilson Our File: 62-51

Enclosed find summons and complaint, together with my check in the sum of \$30.00 representing court costs in the above styled cause.

Please process and oblige.

Yours very truly,

wrt
Enclosures
cc: Dun and Bradstreet, Inc.
cc: Mr. G. V. McQuinn
10/22/62

### PROMISSORY NOTE

I, W. Wilson, promise to pay to the order of Southeastern
Greyhound Lines (Division of The Greyhound Corporation) \$2,965.42 at
its office, 801 North Limestone Street, Lexington, Kentucky; an initial payment
of \$ 100,00 to be made Feb. 15, 1962 and payments of \$ 100.00
per month to be made the 1.5 The of each month until the total indebtedness
is paid with interest thereon at the rate of per cent per annum from
Feb. 15, 1962 until fully paid. The maker and endorser of this note
further agree to waive demand, notice of non-payment and protest; and in case suit
shall be brought for the collection hereof, or the same has to be collected upon
demand of an attorney, to pay reasonable attorney's fees and court costs.
This sum of $$2,968.42$ represents monies collected by me from the sale
of tickets and express for Southeastern Greyhound Lines from OCT 1,196/
to Dec. 29/96/ as shown by reports.
* subject to independent & adit
1-3-62 Date Signature
Witness Co-signer
Subscribed and sworn to before me this 3 day of January 1962
Evelyn M. Wirth  Notary Public

P. O. BOX 71

#### E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA

November 7, 1962

5290

Mrs. Alice Duck Clerk of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

Re: Southeastern Greyhound Lines, Division of the

Greyhound Corporation

Vs: W. W. Wilson

Our File: 62-51

With this we are handing you promissory note in the above styled cause. Request judgment by default for \$2,651.08, the amount of claim, plus interest in the amount of \$114.46, plus attorney's fee in the amount of \$530.22, plus costs, with waiver of exemption, and oblige.

Please send me the certificate of judgment and a cost bill.

Yours very truly,

egled-

EGR/wrt
Encl.
cc: (dup.) Client
11/28/62

2657:08