

F. C. GRIFFIN,
Individually and doing
business as Griffin
Motor Supply,

Plaintiff,

vs.

J. W. BAIN,

Defendant.

I

I

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I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4989

MOTION FOR JUDGMENT BY DEFAULT


Comes now the Plaintiff in the above styled cause by his Attorneys, and moves this Honorable Court to enter a judgment by default in the above styled cause against the Defendant, J. W. Bain and respectfully shows unto the Court as follows:

1. That a copy of the summons and complaint in the above styled cause was served on the Defendant by the Sheriff of Baldwin County, Alabama on the 13th day of January, 1962.

2. That more than thirty days have elapsed since the Defendant was served with a copy of the complaint and a summons to answer the same within thirty days and said Defendant has failed to plead, answer or demur to the complaint in this cause to the date of the filing of this motion.

CHASON & STONE

By:


Attorneys for Plaintiff

F. C. GRIFFIN,
Individually and doing business
as Griffin Motor Supply,

Plaintiff,

VS.

J. W. BAIN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

MOTION FOR JUDGMENT BY DEFAULT

June 2/15/62
Wm. H. Stone
JS

CHASON & STONE

ATTORNEYS AT LAW

BAY MINETTE, ALABAMA

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. W. Bain to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same then and there to answer the complaint of F. C. Griffin, individually and doing business as Griffin Motor Supply.

Witness my hand this 9 day of January, 1962.

Alice J. Duck
Clerk

F. C. GRIFFIN, individually
and doing business as Griffin
Motor Supply,

Plaintiff,

v.

J. W. BAIN,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Five Hundred Ninety-six Dollars and Seven cents (\$596.07) due from him by account on the 22nd day of May, 1961 which sum of money with the interest thereon is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant Five Hundred Ninety-six Dollars and Seven cents (\$596.07) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from, to-wit: the 27th day of July, 1960 until the 22nd day of May, 1961, which sum of money with the interest thereon, is still unpaid.

CHASON & STONE

By:

John Earle Chason
Attorneys for Plaintiff

FILED

JAN 9 1962

ALICE J. DUCK, CLERK
REGISTER

F. C. GRIFFIN, individually and
doing business as Griffin Motor
Supply,

Plaintiff,

v.

J. W. BAIN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED

JAN 9 1962

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 9 day of Jan 19 62
and on 13 day of Jan 19 62
I served a copy of the writ
on J. W. Bain
By service on _____

TAYLOR WILKINS, Sheriff
[Signature]

Sheriff's claims 12 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF