

TED E. CHILDRESS

Plaintiff

VS

GILBERT BEECH

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5684

1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-SIX AND 65/100 DOLLARS (\$126.65), due from him by account on the 25 day of February, 19 58, which sum of money with the interest thereon, is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-SIX AND 65/100 DOLLARS (\$126.65), due him for work and labor done for the Defendant by the Plaintiff on the 25 day of February, 1958, at his request, which sum of money with the interest thereon, is still unpaid.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

Attorneys for the Plaintiff

FILED

AUG 22 1963

AUDRE L. DICK, CLERK
REGISTER

By May be served
in Court #3, Foley, Ala 232

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 GILBERT BEECH

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 _____

GILBERT BEECH

_____, Defendant.

by TED. E. CHILDRESS

_____, Plaintiff.

Witness my hand this 22 day of Aug 1963

Ex-12-7-63

Alice J. Luck, Clerk

No. 5684

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

TED E. CHILDRESS

Plaintiffs

vs.

GILBERT BEECH

Defendants

Summons and Complaint

Filed _____

19__

Clerk _____

Winters, Brantley & Nesbit
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

Aug. 22, 1966

Sheriff.

I have executed this summons

this 7th Dec
by leaving a copy with

Gilbert Beech

Sheriff claims 72

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Jm Eastburn
DEPUTY SHERIFF

Taylor Wilkins
Jm Eastburn

Henry 59

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE _____ CIRCUIT _____ COURT

BALDWIN

COUNTY

CASE No. 5684

TED E. CHILDRESS

, PLAINTIFF

VS

GILBERT BEECH

, DEFENDANT

Comes now the Plaintiff in the above styled cause and moves the court to enter a default judgment against the Defendant upon writ of inquiry, and assigns the following grounds:

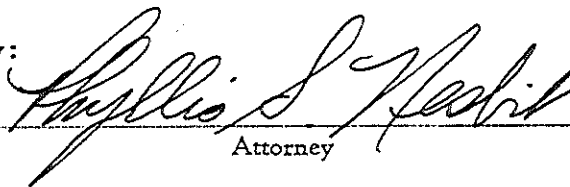
1. Summons and complaint were personally served upon the Defendant on the 7th day of December, 19 63.

2. The Defendant has failed to appear, demur, plead, or answer the said summons and complaint and has wholly defaulted.

3. More than thirty days has lapsed since said service.

Wilters, Brantley and Nesbit

By:



Attorney

AMOUNT OF JUDGMENT \$ 172.65

ATTORNEY'S FEE \$

INTEREST \$

TOTAL \$

STATE OF ALABAMA

BALDWIN COUNTY

AFFIDAVIT

Personally appeared before me, the undersigned authority, in and for said County and State, TED E. CHILDRESS, who after being first duly sworn, deposes and says that he is the Plaintiff in the suit styled Ted E. Childress vs Gilbert Beech filed in the Circuit Court of Baldwin County, Alabama on August 22, 1963. Affiant further says that on the 25th day of February, 1958, the Defendant, Gilbert Beech was indebted to the said Ted. E. Childress in the amount of \$126.65. Further that this indebtedness is still due and unpaid.

Ted E. Childress
AFFIANT

Sworn to and subscribed before me this 17th day of January,
1964.

Phyllis S. Nesbit
Notary Public,
State of Alabama
at Large