

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon F. J. MILSTEAD, 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, Alabama, at the place of holding same by MID-SOUTH CHEMICAL COMPANY, an Tennessee corporation.

Witness my hand this the 29 day of OCT, 1963.

Alice J. Duck
Clerk

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COMPLAINT

MID-SOUTH CHEMICAL COMPANY,)	
a Tennessee corporation)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
)	
VS:)	AT LAW
)	NO. 5791
F. J. MILSTEAD)	
)	
DEFENDANT.)	

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED THIRTY-ONE and 03/100 DOLLARS (\$131.03), due from him by account on, to wit: the 5th of February, 1962, which sum of money, with interest thereon is still unpaid.

COUNT II:

The Plaintiff claims of the defendant ONE HUNDRED THIRTY-ONE and 03/100 DOLLARS (\$131.03), due from him on account stated between the plaintiff and the defendant on, to wit: the 5th of February, 1962, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED THIRTY-ONE and 03/100 DOLLARS (\$131.03), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 5th day of February, 1962, which sum of money, with interest thereon is still unpaid.

Defendant's Address is:

F. J. Milstead
Perdido, Alabama

Wm. Allen M.
Attorney for Plaintiff

FILED

OCT 29 1963

Alice J. Duck, CLERK
REGISTER

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE

Circuit

COURT

Baldwin COUNTY

CASE No. _____

Mulsouth Chemical Co., PLAINTIFF

VS

F. J. Mulshead, 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 5 day of

November, 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.

[Signature]
Attorney

verified acct
AMOUNT OF JUDGMENT \$ 131.03

ATTORNEY'S FEE \$ ~~15.00~~

INTEREST \$ 15.60

TOTAL \$ 146.63

Received 29 day of Oct. 1963
and on 19 day of Oct 1963
I served a copy of the within Summons
on F. J. Milstead

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Albert D. S.
ma

5791

SUMMONS

MID-SOUTH CHEMICAL CO.,
a Tennessee corporation,

PLAINTIFF

VS

F. J. MILSTEAD,

DEFENDANT.

FILED

OCT 20 1963

ALICE J. DUCK, CLERK
REGISTERED

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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FOREST A. CHRISTIAN
FOLEY, ALABAMA