

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE

Circuit

COURT

Baldwin COUNTY

CASE No.

5793F H McDonald

PLAINTIFF

VS.

Jack Hayes

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 31st day of October, 1963

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.

James Clinton
Attorney

AMOUNT OF JUDGMENT \$

215.90

ATTORNEY'S FEE \$

00

INTEREST \$

20

TOTAL \$

215.90

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JACK HAYES, 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 F. H. Mc DONALD, d/b/a MACK'S VARIETY & SUPPLY.

Witness my hand this the 31 day of Oct, 1963.

Alfred J. Duck
Clerk

CCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCCC

COMPLAINT

F. H. McDONALD, d/b/a)	
Mack's Variety & Supply,)	
)	IN THE CIRCUIT COURT OF
PLAINTIFF,)	
)	BALDWIN COUNTY, ALABAMA
VS:)	
)	AT LAW
JACK HAYES,)	
)	
DEFENDANT.)	

COUNT I:

The Plaintiff claims of the defendant TWO HUNDRED FIFTEEN AND 90/100 DOLLARS (\$215.90), due from him by account on, to wit: the 13th day of June, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the defendant TWO HUNDRED FIFTEEN AND 90/100 DOLLARS (\$215.90), due from him on account stated between the plaintiff and the defendant on, to wit: the 13th day of June, 1963, which sum of money , with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the defendant TWO HUNDRED FIFTEEN AND 90/100 DOLLARS (\$215.90), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 13th day of June, 1963, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 9th day of October, 1963.

Defendant's Address is:
Jack Hayes
Orange Beach, Alabama

FILED

OCT 31 1963

Attorney for Plaintiff

64-11-5-63

ALICE J. DUCK, CLERK REGISTER

320

70.5793

SUMMONS

Received 31 day of Oct 1963
and on 3 day of May 1963
I served a copy of the within D & S
on Jack Hayes

By service on _____

TAYLOR WILKINS, Sheriff
By Charles Chidress

Greg Beach

Sheriff claims 120 miles at
Ten Cents per mile Total \$ 12.00
TAYLOR WILKINS, Sheriff
BY Charles Chidress
DEPUTY SHERIFF

F. H. McDONALD, d/b/a
Mack's Variety & Supply,

PLAINTIFF,

VS

JACK HAYES,

DEFENDANT.

FILED

OCT 31 1963

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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FOREST A. CHRISTIAN
FOLEY, ALABAMA