

BERNARD A. CROOKE

Plaintiff

VS.

RUTH S. CROOKE STACEY

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 5608

5608

APPLICATION TO CLERK FOR ENTRY OF DEFAULT
AND SUPPORTING AFFIDAVIT

The Clerk is requested to enter default judgment against the Defendant, Ruth S. Crooke Stacey, in the above entitled action for failure to plead, answer or otherwise defend as set out in the affidavit hereto annexed.

Phyllis S. Nesbit
Attorney for Plaintiff

STATE OF ALABAMA
COUNTY OF BALDWIN

Phyllis S. Nesbit, being duly sworn, deposes and says:

1.

That she is attorney of record of the Plaintiff, and has personal knowledge of the facts set forth in this affidavit.

2.

That the Defendant was duly served with a copy of the summons, together with a copy of Plaintiff's Complaint, on the 13th day of July, 1973.

3.

That more than 30 days have elapsed since the date on which the said Defendant was served with summons and a copy of the Complaint.

4.

That the Defendant is not an infant or an incompetent person.

5.

That the Defendant has failed to answer or otherwise defend as to Plaintiff's Complaint, or serve a copy of any answer or other defense which she might have upon the undersigned attorney of record for the Plaintiff.

6.

That this affidavit is executed by affiant herein in accordance with Rule 55 (a) of the Alabama Rules of Civil Procedure, for the

FILED

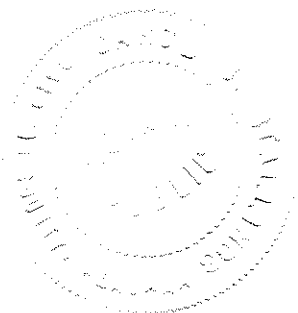
AUG 16 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

purpose of enabling the Plaintiff to obtain an entry of default judgment against the Defendant, for her failure to answer or otherwise defend as to the Plaintiff's Complaint.

Phyllis A. Hesch

Sworn to and subscribed before me this the 15th day of
August, 1973.



Carole L. Helling
Notary Public

FILED

AUG 16 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

BERNARD A. CROOKE

Plaintiff

VS.

RUTH S. CROOKE STACEY

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, NO. 5608

Now comes the Plaintiff in the above entitled cause, Bernard A. Crooke, and shows unto the Court as follows:

That Plaintiff owns a judgment obtained in the Court in cause No. 5608 on the 27th day of August, 1963, for the sum of \$707.00, plus costs of \$23.70, against the above named Ruth S. Crooke Stacey, Defendant and said judgment remains unpaid and unsatisfied. That 10 years will have elapsed within the near future since the rendition of said judgment, original execution having been issued on the 9th day of October, 1963 and which was returned endorsed by the Sheriff, "No property found", on November 8, 1963.

Wherefore, Plaintiff prays that a writ of scire facias issue out of this Court, requiring the Defendant to show cause, if any, within 30 days after service of such writ, why said judgment should not be in all things revived and execution issue on the same; that upon the hearing of this petition, if no legal reason be shown why said judgment should not be revived, an order reviving the same be entered with provisions for execution.

WILTERS, BRANTLEY & NESBIT

BY: 

FILED

JUL 12 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RUTH S. CROOKE STACEY

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.....
RUTH S. CROOKE STACEY

by BERNARD A. CROOKE Defendant.....

Witness my hand this 12 day of July 19 73., Plaintiff.....

Erville B. Blum, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

BERNARD A. CROOKE

Plaintiffs

vs.

RUTH S. CROOKE STACEY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

JUL 12 1973

EUNICE B. BLACKMON
CIRCUIT
CLERK

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives ~~at~~ on
Bon Secour Road
Bon Secour, Alabama

Received in Office
RECEIVED

JUL 12 1973

19.....

Sheriff

I have executed this summons

this JULY 13 1973

by leaving a copy with

Ruth S. Crooke Stacey

72
TAYLOR WILKINS, Sheriff
J. G. Wilkins
Deputy Sheriff
Sheriff

J. G. Wilkins
Deputy Sheriff

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ruth G. Crooke Stacey 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 the same, then and there to answer the complaint of Bernard A. Crooke.

WITNESS my hand, this 10 day of June, 1963.

B. L. French
Clerk

Defendant's address is
Foley, Alabama

* * * * *

BERNARD A. CROOKE,
Plaintiff,
VS.
RUTH G. CROOKE STACEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
720,5608

COMPLAINT

The Plaintiff claims of the Defendant SIX HUNDRED FIFTY DOLLARS (\$650.00) due from her by judgment in favor of James D. Wallace dated March 22, 1962, which sum of money with the interest thereon, is still unpaid, and is the property of the Plaintiff, said judgment having been assigned to the Plaintiff by the said James D. Wallace.

[Signature]
Attorney for Plaintiff

FILED

JUN 10 1963

ALICE J. DUCK, CLERK
REGISTER

EN-6-29-63

MO. 5608

Received 20 day of June 1963
and on 27 day of June 1963
I served a copy of the within S & C
on Ruth G. Crooke Stacey

By service on _____

TAYLOR WILKINS, Sheriff
By [Signature] D. S.

[Signature]

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY C. Childress
DEPUTY SHERIFF

Bernard A. Crooke

vs.

Ruth G. Crooke Stacey

* * * * *