

SEARS, ROEBUCK AND COMPANY,
a Corporation,

Plaintiff

Vs.

WILLIE SCOTT,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

No. 3888

COUNT ONE

Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY-SIX and 62/100 (\$256.62) DOLLARS, due from him by account on to-wit: 1st day of June, 1959, which sum of money with interest thereon is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY-SIX and 62/100 (\$256.62) DOLLARS, due for merchandise, goods and chattels sold by the Plaintiff to the Defendant, which sum of money with interest thereon is still due and unpaid.

John L. Moore
Attorney for Plaintiff

A verified statement of this account is attached hereto and forms a part thereof.

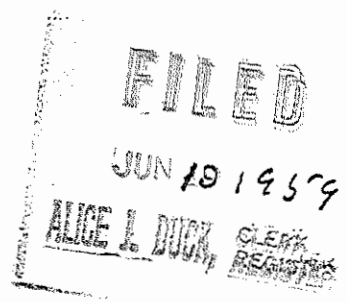
John L. Moore
Attorney for Plaintiff

Defendant may be served at:

Route 1, Box 104 K

Bay Minette, Alabama

or
Place of employment:-
Standard Furniture Mfg. Co.
Bay Minette, Alabama



4623

STATION CHA TOWER, 2300
STATION, 2300

STATION

23

STATION, 2300

STATION

STATION

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

ALICE L. DUCK, CLERK REGISTER

FILED

JUN 19

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

STATION, 2300

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4623

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIE SCOTT

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

WILLIE SCOTT

, Defendant

by SEARS, ROEBUCK AND COMPANY, a corp.

, Plaintiff

Witness my hand this 19 day of June 1957

80

W. J. Duck, Clerk

SEARS, ROEBUCK AND CO.

Mobile, Ala. STORE

ACCOUNT NUMBER HNB221347 DATE 6-9-59

PLEASE MENTION ACCOUNT NUMBER WHEN WRITING OR SENDING PAYMENTS

Willie Scott
Rt. 1 Box 104 K
Bay Minette, Ala.

KINDLY NOTIFY US IF YOU CHANGE YOUR ADDRESS, GIVING NEW AND OLD ADDRESS

MONTHLY PAYMENT \$ DUE OF EACH MONTH

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
	Balance-----			256.62
	Personally before me appeared D. B. Hinds, who after being duly sworn deposes and states that he is Credit Manager for Sears, Roebuck and Co., Mobile, Ala., that he is familiar with the accounts due said company, and that he has personal knowledge of the account described herein and that the foregoing balance is just, due, and unpaid.			
	Sears, Roebuck and Co. By <u>[Signature]</u> Credit Manager			
	Subscribed to and sworn to before me this <u>9th</u> day of <u>June</u> 19 <u>59</u> .			
	<u>[Signature]</u> Notary Public			
	<u>Mobile</u> County, State of <u>Ala.</u>			
	My commission expires <u>3/6</u> 19 <u>62</u>			

PLEASE DO NOT WAIT FOR A NOTICE BEFORE MAKING PAYMENTS

SEARS, ROEBUCK AND CO.

Mobile, Ala. STORE

ACCOUNT NUMBER HNB221347 DATE 6-9-59

PLEASE MENTION ACCOUNT NUMBER WHEN WRITING OR SENDING PAYMENTS

Willie Scott
Rt. 1 Box 104 K
Bay Minette, Ala.

KINDLY NOTIFY US IF YOU CHANGE YOUR ADDRESS, GIVING NEW AND OLD ADDRESS

MONTHLY PAYMENT \$ DUE OF EACH MONTH

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
	Con't	362.45		
2- 4-58	gun 32.95			
	2-box shots 1.10			
	<u>34.05</u>			
	tax .85			
	<u>34.90</u>			
	c/c 3.50			
	<u>38.40</u>			
		38.40		
		<u>400.85</u>		400.85
	Cash paid-----			<u>144.23</u>
	Balance-----			256.62
	Last 3 Payments---			
	October 10, 1958 \$24.00			
	November 8, 1958 24.00			
	December 4, 1958 27.00			
			81	

PLEASE DO NOT WAIT FOR A NOTICE BEFORE MAKING PAYMENTS

SEARS, ROEBUCK AND CO.

Mobile, Ala. STORE

ACCOUNT NUMBER HNB221347 DATE 6-9-59

PLEASE MENTION ACCOUNT NUMBER WHEN WRITING OR SENDING PAYMENTS

Willie Scott
Rt. 1 Box 104 K
Bay Minette, Ala.

KINDLY NOTIFY US IF YOU CHANGE YOUR ADDRESS, GIVING NEW AND OLD ADDRESS

MONTHLY PAYMENT \$		DUE OF EACH MONTH		
DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
10-14-57	tires	120.45		
	shoes	14.24		
		<u>134.69</u>		
	c/c	14.00		
		<u>148.69</u>	148.69	
12- 6-57	suit	18.34		
	c/c	1.83		
		<u>20.17</u>	20.17	
2- 7-58	coupon book	20.00		
	c/c	2.00		
		<u>22.00</u>	22.00	
2-20-58	bike	43.81		
	c/c	4.00		
		<u>47.81</u>		
	dep.	5.00		
		<u>42.81</u>	42.81	
11-13-58	misc. cloth.	30.53		
	car coat	11.25		
		<u>41.78</u>		
	c/c	4.50		
		<u>46.28</u>	46.28	
12- 4-58	coupon book	75.00		
	c/c	7.50		
		<u>82.50</u>	82.50	
		<u>362.45</u>	Con't	

PLEASE DO NOT WAIT FOR A NOTICE BEFORE MAKING PAYMENTS

John L. Moore
Attorney at Law
736 First National Bank Building
Mobile, Alabama

August 3, 1959

Mrs. Alice J. Duck, Clerk-Register
Baldwin County Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Sears, Roebuck & Co., Plain-
tiff vs. Willie Scott
Case No. 3888

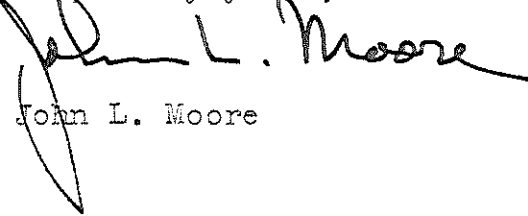
I note that service was had on the defendant on June 30th, 1959, therefore more than thirty (30) days having elapsed since day of service and no appearance having been filed and inasmuch as this suit was brought on a verified statement of the account, I would thank you to take the necessary steps to secure for my client a default judgment.

We have claimed of the defendant the sum of Two Hundred Fifty-six Dollars and 62 Cents (\$256.62), but my Client has informed me that he has ~~paid~~ paid the sum of Fifty (\$50.00) Dollars since suit was filed. Therefore the corrected amount of the judgment should be Two Hundred and Fifty Dollars and 62 Cents (\$250.62), plus cost of court.

You will recall that recently I was a visitor in your office. Let me say again that it was a pleasure to be meet ~~you personally~~ and also that I was impressed with the facilities that I found in your new courthouse.

Thanking you for your co-operation and with best personal regards, I am,

Very truly yours,


John L. Moore

JLM:rew