

3289

BALDWIN COUNTY FEED & SUPPLY  
COMPANY, INC., A Corporation,

Plaintiff,

vs.

CORBIN WILLIAMS,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

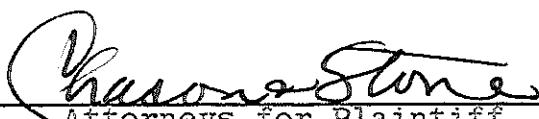
LAW SIDE

Comes the Plaintiff in the above styled cause by and through Chason & Stone as its attorneys of record and files this its motion for a judgment by default in favor of the Plaintiff and against the Defendant and as grounds for its motion says:

1. That a copy of the Summons and Complaint filed in the above styled cause was served upon the Defendant on August 6, 1957, by the Sheriff of Baldwin County, Alabama, and more than thirty days (30) have elapsed since such service and the Defendant has not pleaded, answered or demured to such complaint.

2. The Plaintiff claimed of the Defendant the sum of Three Hundred Twenty-eight and 06/100 Dollars (\$328.06) due by promissory waive note executed by the Defendant payable to the Plaintiff together with interest thereon at the rate of six percent (6%) per annum from November 15, 1956, which interest would amount to the sum of Fifteen and 75/100 Dollars (\$15.75) or a total of Three Hundred Forty-three and 81/100 Dollars (\$343.81) due by the Defendant to the Plaintiff, together with an attorneys fee in the sum of Sixty Dollars (\$60.00) making a total principal, interest and attorneys fee in the sum of Four Hundred Three and 81/100 Dollars (\$403.81).

Dated this the 17<sup>th</sup> day of September, 1957.

  
Attorneys for Plaintiff

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Corbin Williams 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 same, then and there to answer the complaint of Baldwin County Feed and Supply Company, Inc., a Corporation.

Witness my hand this 15 day of July, 1957.

*Deice J. Leach*  
Clerk.

BALDWIN COUNTY FEED & SUPPLY  
COMPANY, INC., A Corporation,

Plaintiff,

vs.

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IN THE CIRCUIT COURT OF  
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LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Thirty-seven and 71/100 Dollars (\$137.71) due from him by account on the 5th day of October, 1956, which sum of money with the interest thereon, is due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of One Hundred Thirty-seven and 71/100 Dollars (\$137.71) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on to-wit from the 14th day of April, 1956, to October 5th, 1956, which sum of money, together with the interest thereon, from October 5th, 1956, is due and unpaid.-

COUNT THREE:

The Plaintiff claims of the Defendant Three Hundred Twenty-eight and 06/100 Dollard (\$328.06) due by Promissory Note made by him on the 5th day of October, 1956, and payable on the 15th day of November, 1956, with interest thereon, which sum of money is still unpaid.

The Plaintiff avers that in, by and as a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure such debt, including a reasonable attorneys fee whether the same be collected or secured by suit or otherwise and the Plaintiff further claims of the Defendant the further and additional sum of Sixty Dollars (\$60.00) as such reasonable attorney's fee.

The Plaintiff further avers that in, by and as a part of said note the Defendant waived as to this debt or any renewal thereof, all rights to exemption under the Constitution and Laws of Alabama as to personal property and of this waiver the Plaintiff now claims the benefit.

  
Attorneys for Plaintiff.