

292

SUMMONS

STATE OF ALABAMA :  
BALDWIN COUNTY : IN THE CIRCUIT COURT, FALL TERM, 1936

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded to summon Leslie Gee, of Bay Minette, Alabama, to appear within thirty days from the service of this writ, in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer to the Complaint of Canterbury Motor Company, a Corporation existing under the Laws of the State of Alabama.

Witness my hand, this 28 day of July, 1936.  
R. L. [Signature]  
Clerk of the Circuit Court.

COMPLAINT

CANTERBURY MOTOR COMPANY, a Corporation existing under the Laws of the State of Alabama, Plaintiff,

vs.

LESLIE GEE,

Defendant.

At Law, No. 292  
IN THE CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA,  
FALL TERM, 1936.

Suit on Promissory Waive Note

The Plaintiff claims of the Defendant the sum of One Hundred Fifteen and 50/100 Dollars (\$115.50) due by Promissory Note made by him on the 8th day of June, 1929, and payable July 8, 1929, which said Promissory Note is under Seal, with interest thereon from July 8, 1929, together with the costs of this suit; and the Plaintiff claims the further and additional sum of Thirty Dollars (\$30.00) as a reasonable attorney's fee in the premises; and the Plaintiff alleges that as part of the said Note, the Defendant has waived all right to claim any of his personal property as exempt from levy, execution, sale, or other legal process under the Constitution and Laws of the State of Alabama, or of any other State.

[Signature]  
LESLIE HALL, Attorney for the Plaintiff

I have executed the within writ by leaving a copy of the summons and complaint with:

Leslie Gee

the defendant, to-wit this

30 day of July,

M. H. Wilkins  
Sheriff,

by C. N. Anderson

Book  
RECORDED Law, No. 292  
7-531

CANTERBURY MOTOR COMPANY, A Corporation existing under the Laws of the State of Alabama,

Plaintiff,

vs.

LESLIE GEE,

Defendant.

SUMMONS AND COMPLAINT ON  
PROMISSORY WAIVE NOTE

IN THE CIRCUIT COURT FOR  
BALDWIN COUNTY, ALABAMA.  
FALL TERM, 1936.

Filed in Office this 28<sup>th</sup>  
day of July, 1936.

[Signature]  
Clerk.

(115)

Rec in office

7/28/36

M. H. Wilkins - SJF

LESLIE HALL  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

STATE OF ALABAMA )  
BALDWIN COUNTY )

CANTERBURY MOTOR COMPANY, A Corp.,  
vs.  
LESLIE GEE. No. 292.

Affidavit as to Attorney's Fee

Before me, P. E. Teter,

a Notary Public in and for said County in said State, personally appeared H. E. Smith,

who, being first duly and legally sworn, deposes and says:

I am a practicing Attorney at Law in Bay Minette, Baldwin County, Alabama, and as such am familiar with attorney's fees generally charged by members of the Bar in said County and State;

I have examined the file in the case of Canterbury Motor Company vs. Leslie Gee, Law Side No. 292, in the Circuit Court of Baldwin County, Alabama, and from such examination, I do state that, in my opinion as an attorney at law, the sum of Thirty Dollars is a reasonable attorney's fee in a suit on a Promissory Note for \$115.50 and interest from July 8, 1929.

H. E. Smith

Sworn to and subscribed before me on this the 8 day of

September, 1936.

P. E. Teter  
Notary Public, Baldwin County, Ala.

RECORDED  
*Duck* At Law, No. 292  
*7-552*

CANTERBURY MOTOR COMPANY,  
A Corporation,

vs.

LESLIE GEE.

~~XXXXX~~

Affidavit as to Attorney's  
Fee.

Filed in Office this *8th*  
day of *Sept.*, 1936.  
*R. S. Duck*  
Clerk.

STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT

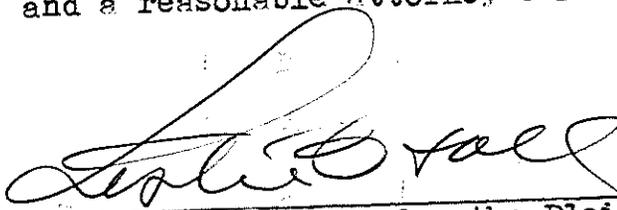
CANTERBURY MOTOR COMPANY, Inc.,  
vs.  
LESLIE GEE. Civil No. 292.

Motion for Judgment by Default

Comes now the Plaintiff in the above-styled cause,  
by its attorney, Leslie Hall, and shows unto your Honor as follows:

That more than thirty days have elapsed since the  
service of summons and copy of the Complaint in said cause on the  
Defendant, Leslie Gee, and that the said Defendant has failed to  
answer said Complaint, and has wholly made default;

Wherefore, your Complainant respectfully moves the  
Honorable Court to grant it a Judgment by Default against the  
said Defendant, for the amount claimed in the said Complaint, plus  
interest at the legal rate, and a reasonable attorney's fee, and  
the costs of this suit.

  
LESLIE HALL, Attorney for the Plaintiff.

Civil No. 292

RECORDED

*Duck*

*7-563*

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Canterbury Motor Co., Inc.,

vs.

Leslie Gee.

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Motion for Judgment by Default.

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Filed in office this

*16* day of *Sept.*,

1936.

*R. S. Duck*  
Clerk.