

1807

DAVID BUSH AND EUGENE
BUSH, :

Plaintiffs, :

Vs. :

JOHN H. WHITE, :

Defendant. :

IN THE CIRCUIT COURT

OF


THE TWENTY-FIRST JUDICIAL

DISTRICT OF THE STATE OF

ALABAMA.

Come the plaintiffs in the above styled cause, and show unto the Court that the summons and complaint in said cause have heretofore been served upon defendant by due process of law; that more than thirty days has intervened between the date of service and the date of the filing hereof; and that said defendant has wholly failed or refused to appear, plead, answer or demur;


WHEREFORE, the premises considered, the plaintiffs move the Court that a judgment by default be entered in favor of the plaintiffs and against the defendant, with leave of the Court to the plaintiffs to prove the damages sustained.


Attorney for Plaintiffs

DAVID BUSH AND EUGENE :
BUSH, :
Plaintiffs, : IN THE CIRCUIT COURT
Vs. : OF
JOHN H. WHITE, : THE TWENTY-FIRST JUDICIAL
Defendant. : DISTRICT OF THE STATE OF
ALABAMA.

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WHEREFORE, the premises considered, the plaintiffs move the Court that a judgment by default be entered in favor of the plaintiffs and against the defendant, with leave of the Court to the plaintiffs to prove the damages sustained.


Attorney for Plaintiffs

RECORDED

RECEIVED
JAN 3 1947
FEDERAL BUREAU OF INVESTIGATION
U. S. DEPARTMENT OF JUSTICE

TO DIRECTOR, FBI
FROM SAC, NEW YORK
SUBJECT: [illegible]
RE: [illegible]

[illegible text block]

TO DIRECTOR, FBI
FROM SAC, NEW YORK
SUBJECT: [illegible]
RE: [illegible]


Filed
1-3-47
Alice J. [illegible]
Clerk.

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned authority, personally appeared Alexander Foreman, Jr., who after being by me first duly sworn, on oath deposes and says:

That he is the attorney for the plaintiffs in that certain cause styled David Bush and Eugene Bush vs. John H. White, now pending in the Circuit Court of the 21st Judicial District of the State of Alabama; that he has made inquiry of various parties and as a result of such inquiries he is informed and believes and upon such information and belief states the fact to be that the defendant in said cause, John H. white, is not in the Armed Services of the United States of America as contemplated by the Soldiers and Sailors Relief Act of 1940 as amended; that said John H. White is in the business of hauling pulpwood and that the said John H. White resides in Loxley, Alabama.


Alexander Foreman, Jr.

Subscribed and sworn to before
me this 6th day of January 1947.


Notary Public, Mobile County, Alabama.

ROBERTA ROBERTA, ROBERTA ROBERTA, ALBANY.

me this 1st of January 1941.

Subscribed and sworn to before

Alexander Foreman, Jr.

RECORDED

Highwood and that the said John H. White resides in Dorchester, Massachusetts; that said John H. White is in the presence of persons contemplated by the Soldiers and Sailors Relief Act of 1940 as is not in the Armed Services of the United States of America as the fact is that the defendant in said cause, John H. White, formed and believes and upon such information and belief states various parties and as a result of such information he is in District of the State of Virginia; that he has made inquiry of White, now residing in the District Court of the State of Virginia, certain cause styled David Bush and Eugene Bush vs. John H. White, that he is the attorney for the defendant in that

only sworn, on oath before and says:

before Alexander Foreman, Jr., who after being by me first

before me, the undersigned authority, personally so-

COMMISSIONER OF ROBERTA.

STATE OF VIRGINIA:

Filed

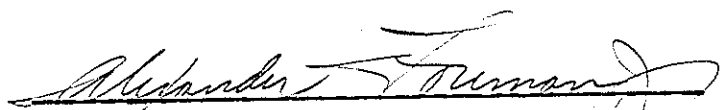
1-16-41

Alvin J. Smith
J. Smith

DAVID BUSH AND EUGENE : IN THE CIRCUIT COURT FOR THE
BUSH, :
PLAINTIFFS, : 21ST JUDICIAL CIRCUIT OF THE
Vs. : STATE OF ALABAMA.
JOHN H. WHITE, :
DEFENDANT. :

COUNT I

The plaintiffs claim of the Defendant the sum of, to-wit,
Four Hundred Dollars (\$400.00) as damages, for that on, to-wit,
the 26th day of August 1946, said Defendant so negligently
operated or drove an automobile or truck on or along Alabama
Highway 104 at or near the town of Daphne, Baldwin County,
Alabama, which said highway is a public highway at said point,
as to cause the same to run into, upon or against an auto-
mobile of the plaintiffs which was being operated along said
highway at said point, and as a proximate result thereof
plaintiffs automobile was greatly bent, broken, injured,
bruised and damaged in the aforesaid sum; wherefore plaintiffs
sue.



Attorney for plaintiffs
207 First National Bank Building
Mobile 13, Alabama

Defendant's Address:

Loxley, Alabama

