

THE	STATE	OF	ALABAMA,
	Baldw	in C	ounty

CIRCUIT COURT, November Term, 19 48

J. A. PILGRIM	•	
	·	
Plaintiff		
No. 1128		
$\mathbf{v}_{\mathbf{s}}$		
D. W. EWING		
	······································	
Defendant .		
en de la companya de La companya de la co		
I, Alice J. Duck	lerk of the Circuit Court of E	aldurin Country
	seem of the chedit court of E	aluwin County,
Alabama, do hereby certify that on the50%h day of	October	19-48-
		•
a Judgment was rendered by said Court in the above st	tated cause, wherein	
J. A. PILGRIM		
The District of the second		
was Plaintiff and		
D. W. EWING	777	na Dafandant in
	W	is Defendant, in
avor of the said Plaintiff and against the said Defendant t	for the sum of	
Eighty-four and 56/100		DOLLARS
nd for the sum of Eleven and 15/100		DOLLARS,
		:
he costs in said suit, and that F A Christian		······
	are the Attornoons of monoral f	on the Disintiff
n said cause.	one recordings of fecold f	or the Fiallithia
a satu cause.		
Witness my hand this 2nd day of November	I 10	· · 48
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Clerk Circuit Court, Baldwin County, Alabama.

SUMMONS & COMPLAINT

THE STATE OF ALABAMA:

BALDWIN COUNTY:

TO ANY SHERIFF OF THE STATE OF ALABAMA: You are hereby commanded to summon D.W. EWING, 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 D.W. EWING, by Mrs J.A. Pilgrim of Elberta, Alabama.

Witness my hand this the 30 day of December, 1947.

CLERK

J.A. PILGRIM

Plaintiff

_⊽s-

D.W. EWING

Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

The Plaintiff claims of the Defendant \$81.16, due by promissory note, made by him on the 19th day of April, 1945, and payable on the 1st day of July, 1946, with interest thereon at the rate of 6% per annum, from date until paid. The Plaintiff acknowledges the payment of the sum of \$10.00, on the 5th day of April, 1945, which has been applied to the interest.

The Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant, waived his right to payment of this debt, all rights of exemption under the Constitution and Laws of the State of Alabama, or any other state in the United States and agreed to pay a reasonable attorney's fee for the collection thereof, and the Plaintiff claims the sum of \$25.00, as such attorney's fee.

Forest A. Christian Foley, Alabama

Attroney for Plaintiff

The Defendant lives at Gasque, Alabama

1128

Received in Sheriff's Office this 30 day of Dec., 1947 TAYLOR WILKINS, Sheriff

Executed 19 18 by serving copy of within Summons and Complaint on

D.W. Ewing

Jaylor Wilkin 15he 17 By Deputy Shoriff

SUMMONS & COMPLAINT

J.A. PILGRIM
Plaintiff

-vs-

D.W. EWING

Defendant

FILED

DEC 30 1947

FRICE V. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

J.	A. E	PILGRIM,	Plaintiff	·) IN	THE (CIRCUIT	COURT	OF
,	٧s	š.) BA:	IDW IN	COUNTY,	AIABA	LMA.
D.	W. I	av ing,	Defendant	,			AT LAW		

Comes the Plaintiff by his attorney and moves the Court to render Judgment by Default against the Defendant in the total amount of EIGHTY FOUR & 56/100 DOLLARS (\$84.56), which includes attorney's fees and interest to date (the Defendant having made some payments since suit was filed.)

Forest A. Christian, Foley, Alabama Attorney for Plaintiff 1128 RECORDED

MOTION FOR JUDGMENT BY DEFAULT

J. A. PILGRIM,

Plaintiff

vs.

D. W. EWING.

Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

Filed 8-5-48 Deine J. Duch Register