

MOTION FOR JUDGMENT BY DEFAULT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

GAAR'S STORE,
Donald Gaar, Owner,
Plaintiff

VS.

C. F. SMITH,
Defendant

IN THE CIRCUIT COURT OF
BAIDWIN COUNTY, ALABAMA
AT LAW

Comes the Plaintiff by his attorney and requests the Court to render Judgment by Default in this case. It appears that the said Judgment should be in the amount of \$119.70, principal, plus interest at 6% from January 14, 1948, to date, which amounts to \$2.00, for a total of \$121.70.

James A. Haley
James A. Haley, Alabama

Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

RECORDED

Motion for Judgment by Default

GAAR'S STORE,
Donald Gaar, Owner,
Plaintiff

vs.

G. F. SMITH,
Defendant.

Filed

3-5-46

Miss J. Luck
clerk

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. F. SMITH 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, plead or demur, the complaint of GAAR'S STORE, Foley, Alabama, Donald Gaar, owner.

Witness my hand this the 30th day of March, 1948.

Alice J. Duck
Clerk

GAAR'S STORE,
Donald Gaar, Owner,
Plaintiff

vs.

C. F. SMITH,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETEEN & 77/100 DOLLARS (\$119.77) for merchandise, goods and chattels sold to the Defendant by the Plaintiff on the 3rd day of December, 1947, and on the 14th day of January, 1948, which sum of money, with interest thereon, is still unpaid.

Forest A. Christian
Forest A. Christian,
Attorney for Plaintiff

An itemized statement of
said account, verified by
the affidavit of Donald
Gaar, is attached and made
a part hereof.

Forest A. Christian
THE DEFENDANT LIVES AT FOLEY, ALABAMA.
(CIRCLE INN)

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

Before me, Forest A. Christian, a Notary Public in and for said County and State, personally appeared Donald Gaar, who, being by me duly sworn, deposes and says that he is the owner of Gaar's Store; that C. F. Smith owes Gaar's Store the amount of \$119.77 for groceries purchased as follows: on December 3, 1947, \$34.30, for which a check was drawn on the State Bank of Elberta, which check was returned marked "Insufficient Funds" and January 14, 1948, \$70.26, for which a check was drawn on the State Bank of Elberta, which check was returned marked "Insufficient Funds", and \$15.21 purchased in groceries on the same date, January 14, 1948; which is a just, true and correct amount after deducting all credits, set-offs or counterclaims.

Donald Gaar

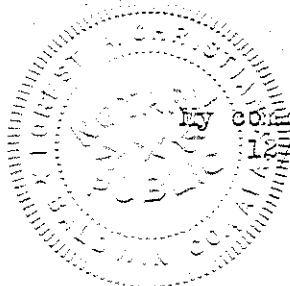
Affiant

Sworn to and subscribed before me this the 29th day of March, 1948.

Forest A. Christian

Notary Public

My commission expires:
12/27/49



Received in Sheriff's Office
this 30 day of Mar, 1948
TAYLOR WILKINS, Sheriff

Executed By sending a
Copy of the Written Order
to O. F. Smith 3-31-48
Taylor Wilkins Sheriff
Zellie B. Griffin D.S.

1170
RECORDED
SUMMONS AND COMPLAINT

GAAR'S STORE,
DONALD GAAR, Owner,
Plaintiff

vs.

O. F. SMITH,
Defendant

CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, AT LAW

Filed
3-30-48
Alvin J. French
Deputy

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA