

1183

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA: You are hereby commanded to summon ODIES LEE 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 ODIES LEE by HOME FINANCE, CLIFF BECK, Owner.

Witness my hand this the 22<sup>nd</sup> day of April, 1948.

Alice J. Ducha  
Clerk

.....

HOME FINANCE,  
Cliff Beck, Owner,  
Plaintiff

vs.

ODIES LEE,  
Defendant

)  
) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY, ALABAMA  
)  
) IN LAW  
)

COMPLAINT

The Plaintiff claims of the Defendant the sum of \$204.00 on breach of agreement entered into by him on the 25th day of October, 1947, wherein the defendant sold an automobile, described as: Used - Model 1935 - 8 Cylinder Buick - 4-D Sedan, Motor No. 2961796, to one, Isiah McCall under a Conditional Sale Contract, by which he promised, jointly and severally, with the said Isiah McCall to pay \$216.00, principal, payable in eighteen (18) weekly installments of \$12.00 each, together with interest at the highest lawful rate, after maturity.

The Sales Contract provides that "15% of the amount due hereunder shall be paid by the purchaser as attorney's fees."

The defendant in, by and part of said Conditional Sales Contract, waives all homestead and other property exemption laws.

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

There is attached hereto and made a part hereof, an itemized statement of the amount of this claim, verified by the affidavit of a competent witness, made before and certified to by a Notary Public, which shows the amount owed on this claim as of April 20, 1948.

Forest A. Christian

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

AFFIDAVIT OF RICHARD V. RANKIN

Richard V. Rankin, first being duly sworn, deposes and says as follows:

That he is assistant manager of the Home Finance Co., Cliff Beck, owner; that he knows that Odies Lee executed a Dealer's Assignment and Guaranty of a Conditional Sales contract; and that Odies Lee owes the Home Finance Co. the sum of TWO HUNDRED FOUR & 00/100 DOLLARS (\$204.00), after allowing all credits due him.

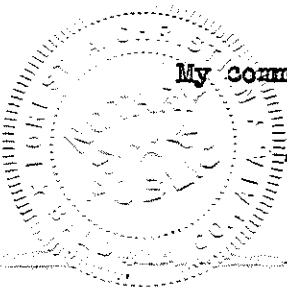
Richard V. Rankin  
Affiant

Sworn to and subscribed before me, a Notary Public in and for Baldwin County, Alabama, this the 20th day of April, 1948.

Henry D. Clark  
Notary Public

My commission expires:

12-27-49



Received in Sheriff's Office  
this 22 day of April, 1948  
TAYLOR WILKINS, Sheriff

Executed 4-24-1948  
by serving copy of within Summons and  
Complaint on

Odies Lee

Taylor Wilkins Sheriff

By H. F. Hall Deputy Sheriff

1183

RECORDED

SUMMONS AND COMPLAINT

HOME FINANCE,  
CLIFF BECK, OWNER,  
Plaintiff

vs.

ODIES LEE,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW

Filed  
4-22-48  
Alice J. Duck  
clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

THE STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

HOME FINANCE,  
Cliff Beck, Owner,  
Plaintiff

VS.

**ODIES LEE ,**  
**Defendant**

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

Comes the Plaintiff by its attorney and moves the court to render Judgment by Default in the amount of \$204.00 principal, plus \$30.60 as attorney's fees, for a total of \$234.60.

An affidavit of the amount owed was attached to the original Bill.

Said Judgment should waive all homestead and other property exemptions.

Forest A. Christian, Foley, Alabama  
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
Cliff Beck, Owner, Plaintiff

vs.

ODIES LEE, Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

*Filed 5-26-48  
Alice Queen  
clerk*