

1188

MOTION FOR JUDGMENT BY DEFAULT


KORET OF CALIFORNIA, INC.,
A Corporation,
Plaintiff

vs.

HATTIE'S RESORT SHOP,
Mrs. Louise Hatfield Brown, owner,
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 FIVE HUNDRED FIFTY SIX & 40/100 DOLLARS (\$556.40). There was attached and made a part of the original complaint an itemized statement of this claim verified by the affidavit of a competent witness, made before and certified to by a notary public.


Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

KORET OF CALIFORNIA, INC.
A Corporation,

Plaintiff

vs.

HATTIE'S RESORT SHOP,
Mrs. Louise Hatfield Brown,
Owner,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

*filed
6-16-48
Alice French
clerk*

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summon HATTIE'S RESORT SHOP, Mrs. Louise Hatfield Brown, owner, 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 the Complaint of KORET OF CALIFORNIA, INC., a corporation.

Witness my hand this the 13th day of May, 1948.

Alice J. Smith
Clerk
.....

COMPLAINT

KORET OF CALIFORNIA, INC., A Corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
)	AT LAW
HATTIE'S RESORT SHOP, Mrs. Louise Hatfield Brown, owner,)	
Defendant)	

COUNT I

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FIFTY SIX & 40/100 DOLLARS (\$556.40), together with interest thereon, due from her by account on, to wit: the 5th day of May, 1948, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FIFTY SIX & 40/100 DOLLARS (\$556.40), together with interest thereon, due from her on account state between the Plaintiff and the Defendant on, to wit: the 5th day of May, 1948, which sum of money together with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FIFTY SIX & 40/100 DOLLARS (\$556.40), together with interest thereon, due from her for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 5th day of May, 1948, which sum of money with the interest thereon is still unpaid.

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 May 5, 1948.

I, Forest A. Christian, attorney, will be personally liable for the court costs in this case.

Forest A. Christian Forest A. Christian

State of California

City of San Francisco

County of San Francisco

ss.

being duly sworn, doth depose and say, that he is Leslie E. Spelman Vice-President of
Koret of California 611 Mission St. S. F. Cal that the annexed statement of the account of

Hattie's Resort Shop

lately doing business at Alabama Foley

in the State of Alabama is just, true and correct, that there is now due \$556.40

the sum of Five hundred fifty six and .40 Dollars

that no part thereof has been paid or satisfied, and that there are no set-offs, or counterclaims thereto to the knowledge or belief of deponent.

Sworn to before me, this

day

of

1948

Paul Power
NOTARY PUBLIC

and for the City and County of San Francisco

State of California

My Commission Expires, Sept. 9, 1950

Leslie E. Spelman
Leslie E. Spelman Vice-Pres.

RECORDED 1188

Received in Sheriff's Office

this 13 day of May, 1948

TAYLOR WILKINS, Sheriff

Executed by leaving
copy with Cecil Chason
Defendant's atty.

Service of a copy
of the within Complaint
Summons and Complaint
made on me, as agent
and attorney for the
defendant on this the
14 day of May, 1948.
Service accepted.

[Signature]
att'y for defendant

SUMMONS AND COMPLAINT

KORET OF CALIFORNIA, INC.
A CORPORATION,

PLAINTIFF

VS.

HATTIE'S RESORT SHOP,
MRS. LOUISE HATFIELD BROWN, OWNER,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

Filed
5-13-48
Wiley J. Luck
clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Taylor Wilkins
by R.R. Willis D.S.