

1217

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
C. Cliff Beck, Owner,  
Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON,  
Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

Comes the Plaintiff by its attorney and moves the court to render Judgment by Default in the amount of \$116.96, principal, plus \$25.00 as attorney's fees, for a total of \$143.96, against Dennis Richardson, one of the Defendants.

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

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MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
C. Cliff Beck, Owner

Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON,

Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

FILED

SEP 21 1948

ALICE J. DUCK, Clerk

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon WILLIE BEN WALTON and DENNIS RICHARDSON 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 WILLIE BEN WALTON and DENNIS RICHARDSON by HOME FINANCE, C. Cliff Beck, owner.

Witness my hand this the 5<sup>th</sup> day of August, 1948.

Alice J. Luck  
Clerk

COMPLAINT

HOME FINANCE,  
C. Cliff Beck, Owner. Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON, Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

The Plaintiff claims of the Defendants the sum of ONE HUNDRED EIGHTEEN & 96/100 DOLLARS (\$118.96), which is the balance due on a note made by them on the 14th day of December, 1946.

In, by and as agent of said note the Defendants waive all rights of exemption under the Constitution and Laws of the State of Alabama or any state, as to personal property.

The said note provides for a reasonable attorney's fee, which Plaintiff alleges to be \$25.00.

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

There is attached hereto and made a part hereof 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 July 31, 1948.

Forest A. Christian

The Defendants live in the colored quarters Southwest of Foley.

undersigned defendant of before  
the defendant file in the county

2001/12/10/14

claim as of 1914 at 10:00  
which some the amount owed on this  
contracted to pay a monthly payment  
before payment made before and  
best interest and welfare of a com-  
munity is affected hereby and hereby

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

Filed 8-5-48  
Alice J. Duck  
clerk

ALABAMA 101 BALDWIN

ALABAMA 101 BALDWIN

SUMMONS & COMPLAINT

HOME FINANCE,  
OF CLIFF BECK, OWNER,

Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON,

Defendants

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SUMMONS

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 )  
BALDWIN COUNTY. )

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Witness my hand this the 3<sup>rd</sup> day of August, 1948.

Allice J. Much  
Clerk

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COMPLAINT

HOME FINANCE,  
C. Cliff Beck, Owner,  
Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON,  
Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

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

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Forest A. Christian 8/1/48

The Defendants live in the colored quarters Southwest of Foley.

THE STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

AFFIDAVIT OF C. CLIFF BECK

C. Cliff Beck, first being duly sworn, deposes and says as follows:

My name is C. Cliff Beck, and I am the owner of Home Finance. On December 14, 1946, Home Finance loaned Willie Ben Walton and Dennis Richardson the sum of \$284.96, which was due in 16 installments of \$17.81 each, beginning December 21, 1946, and on the last day of each consecutive week thereafter, until the full amount is paid. There is still an unpaid balance of \$118.96, due on this account as of the 31st day of July, 1948, after allowing all due credits.

C. Cliff Beck  
Affiant

Sworn to and subscribed before me, a Notary Public, this the 4<sup>th</sup> day of August, 1948.

Forrest C. H. H. H.  
Notary Public

My commission expires:

12-27-49



Received in Sheriff's Office  
this 5 day of Aug 1948  
TAYLOR WILKINS, Sheriff

RECORDED

Executed by leaving  
copy with  
Dennis Richardson  
Aug 12<sup>th</sup> 1948

Willie B. Walton Not found

Jay Lee Wilkins Shipp  
by R. L. Wallis H. L.

SUMMONS & COMPLAINT

HOME FINANCE,  
O. CLIFF BECK, OWNER,  
Plaintiff

vs.

WILLIE BEN WALTON and  
DENNIS RICHARDSON,  
Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN LAW

Filed 8-5-48  
Alice French  
clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA