

1240

MOTION FOR JUDGMENT BY DEFAULT

W. P. BALLARD & COMPANY,
(An Alabama Company, doing
business in Birmingham,
Alabama.)

Plaintiff

vs.

K. Z. JOHNSON,
Doing business as DuBROCK
LAUNDRY & CLEANERS,

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 THREE HUNDRED FIVE & 79/100 DOLLARS
(\$305.79), plus interest from the 15th day of June, 1948.

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

Forest A. Christian

Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

W. P. BALLARD & COMPANY,
(An Alabama Company, doing business
in Birmingham, Alabama.)

Plaintiff

vs.

K. Z. JOHNSON,
Doing business as DuBROCK LAUNDRY
& CLEANERS.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

NOV 12 1948

ALICE J. DUCK, Clerk

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon K. Z. JOHNSON, doing business as DuBROCK LAUNDRY & CLEANERS, 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 W. P. BALLARD, (an Alabama company, doing business in Birmingham, Alabama).

Witness my hand this the 29th day of Sept, 1948.

Alice J. French
Clerk

...v.....

COMPLAINT

W. P. BALLARD & COMPANY
(An Alabama Company, doing
business in Birmingham,
Alabama.)

Plaintiff

vs.

K. Z. JOHNSON,
Doing business as DuBROCK
LAUNDRY & CLEANERS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT I

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIVE & 79/100 DOLLARS (\$305.79), together with interest thereon, due from him by account on, to wit: the 15th day of June, 1948, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIVE & 79/100 DOLLARS (\$305.79), together with interest thereon, due from him on account state between the Plaintiff and the Defendant on, to wit: the 15th day of June, 1948, which sum of money together with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defenant the sum of THREE HUNDRED FIVE & 79/100 DOLLARS (\$305.79), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 15th day of June, 1948, which sum of money with the interest thereon is still unpaid.

There is attached hereto and made a part hereof a verified statement of a competent witness, made before and certified to before a Notary Public, which shows the amount owed on this claim as of June 15, 1948.

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

STATEMENT
W. P. BALLARD & COMPANY
 IMPORTERS AND JOBBERS
 LAUNDRY, DRY CLEANING AND HATTERY SUPPLIES
 1521 FIRST AVE NORTH P.O. BOX 948
 BIRMINGHAM 1, ALA.

DuB rock Laundry
 Fairhope, Alabama

AUG 14 1948

| DATE | CHARGES | DATE | CREDITS | DATE | BALANCE |
|--|---------|----------|---------|---------------------|---------|
| | | | | MAR 28 47 | 68.34 |
| MAY 13 47 | 69.27• | | | | |
| JUN 24 47 | 27.09 | OCT 8 47 | 50.00÷ | | |
| NOV 20 47 | 176.28 | FEB 5 48 | 50.00÷ | | |
| NOV 26 48 | 64.81• | | | JUL 28 48 | 305.79 |
| STATE OF ALABAMA) | | | | | |
| JEFFERSON COUNTY) | | | | | |
| Before me (a Notary Public in and for Jefferson County) personally appeared the undersigned, who upon oath says that the within account is a just, correct and proper charge (Against DuBrock Laundry, Fairhope, Alabama, and that no part thereof has ever been paid. | | | | | |
| | | | | <u>L. G. Ryland</u> | L.S. |
| Sworn and subscribed to before me this the | | | | <u>13th</u> | |
| day of | | | | <u>August</u> | |
| | | | | <u>1948</u> | |
| | | | | <u>W. M. Rhodes</u> | |

THIS IS A STATEMENT OF YOUR ACCOUNT

Received in Sheriff's Office
this 29 day of Sept. 1948
TAYLOR WILKINS, Sheriff

RECORDED m 1740

Executed Sept 5 1948
by serving copy of within Summons and
Complaint on

K. Z. Johnson

Taylor Wilkins Sheriff

By W. F. Hall Deputy Sheriff

SUMMONS AND COMPLAINT

W. P. BALLARD & COMPANY
(An Alabama Company, doing
business in Birmingham,
Alabama.)

Plaintiff

vs.

K. Z. JOHNSON,
Doing business as DuBROCK
LAUNDRY & CLEANERS,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

FILED

SEP 29th 1948

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

CERTIFICATE OF JUDGMENT

Printed by The Baldwin Times, Bay Minette, Ala.

THE STATE OF ALABAMA, }
Baldwin County

CIRCUIT COURT, Nov. Term, 1948

W. P. BALLARD & CO.

Plaintiff....

Vs.

K. Z. JOHNSON ET AL.

Defendant ..

I, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 13th day of November, 1948,

a Judgment was rendered by said Court in the above stated cause, wherein

W. P. BALLARD & CO.

was Plaintiff and K. Z. JOHNSON

was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

THREE HUNDRED FIVE AND 79/100 (\$305.79) DOLLARS

and for the sum of ELEVEN AND 15/100 (\$11.15) DOLLARS,

the costs in said suit, and that F. A. CHRISTIAN

are the Attorneys of record for the Plaintiff

in said cause.

Witness my hand this 16th day of November, 1948

STATE OF ALABAMA, BALDWIN COUNTY

Filed Nov. 27, 1948 P. M.

Recorded J. A. G. book 4 page 215

Alice J. Duck
Clerk, Circuit Court, Baldwin County, Alabama.

J. A. G.
Judge of Probate

MO 12415

CERTIFICATE OF JUDGMENT

11-16-48

W. D. Ballard & Co. 11

, Plaintiff...

Vs.

81

H. Z. Johnson et al.

4-215

, Defendant...

one

12-3-50

James C. Hamilton