

1255

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT LAW SIDE
TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons G. H. Bonie to appear with-
in thirty (30) 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 J. F. Walker.

WITNESS my hand this 12th day of October, 1948.

Reice J. Dorch
Clerk

J. F. WALKER,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
-vs-)	BALDWIN COUNTY, ALABAMA
G. H. BONIE,)	LAW SIDE
Defendant.)	

COUNT I

The plaintiff claims of the defendant One Thousand & 00/100
Dollars (\$1,000.00) due by Promissory Waive Note made by him on,
to-wit, May 15, 1948, and payable on, to-wit, sixty (60) days after
date with interest at the rate of six per cent (6%) per annum from
maturity.

The plaintiff avers that in and by the terms of said note, the
defendant waived all right to exemption under the Constitution and
Laws of Alabama or any other state as to personal property and of
this waiver the plaintiff now claims the benefit.

The plaintiff further avers that in and by the terms of said
note, the defendant agreed to pay all cost of collecting or securing
or attempting to collect or secure this note, including a reasonable
attorney's fee and the plaintiff further claims of the defendant the
further and additional sum of \$150.00 as such reasonable attorney's
fee.

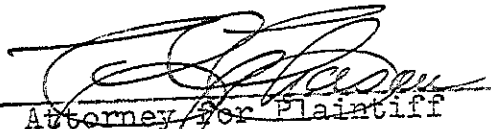
COUNT II

The plaintiff claims of the defendant Five Hundred & 00/100
Dollars (\$500.00) due by Promissory Waive Note made by him on, to-
wit, May 15, 1948, and payable on, to-wit, thirty (30) days after

date with interest at the rate of six per cent (6%) per annum from maturity.

The plaintiff avers that in and by the terms of said note, the defendant waived all right to exemption under the Constitution and Laws of Alabama or any other state as to personal property and of this waiver the plaintiff now claims the benefit.

The plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all cost of collecting or securing or attempting to collect or secure this note, including a reasonable attorney's fee and the plaintiff further claims of the defendant the further and additional sum of \$75.00 as such reasonable attorney's fee.


Attorney for Plaintiff

Received in Sheriff's Office
this 12 day of Oct, 1948
TAYLOR WILKINS, Sheriff

Presented 10-18 1948
By serving copy of within Summons and
Complaint on

G. H. Bonie

Taylor Wilkins Sheriff
By Ed Geo. Shadham Deputy Sheriff

no 1265

RECORDED

SUMMONS AND COMPLAINT

J. F. WALKER,

Plaintiff,

-VS-

G. H. BONIE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

FILED

OCT 12 1948

ALICE J. DUCK, Clerk

C. G. Chason
Attorney at Law
Foley, Ala.

J. F. WALKER,

Plaintiff,

VS.

G. H. BONE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 1255.

This day came the parties by their attorneys and Defendant's Demurrer to Plaintiff's Complaint being argued by counsel, and understood by the Court, and the same being considered by the Court, it is considered, ordered and adjudged that said Demurrers be and they are hereby overruled.

Defendant joins issue on Plaintiff's Complaint.

Dated this 15th day of February, 1949.

Jelfair J. Mashburn, Jr.
Judge

RECORDED

RECORDED

RECORDED

FILED

FEB 18 1949

ALICE J. BUCK, Clerk

J. F. WALKER,
Plaintiff


vs.

G. H. BONIE,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DEFENDANT'S ANSWER

Comes the Defendant and for answer to each count says that they do not state a cause of action.


G. H. Bonie, Defendant

Copy made by
C.B.C. 11-19-48

RECORDED

ANSWER

J. F. WALKER,
Plaintiff

vs.

G. H. BONIE,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 125-5

FILED

NOV 13 1948

ALICE J. DUCK, Clerk

RECEIVED
NOV 13 1948
C. B. C. 11-19-48

RECEIVED
NOV 13 1948
C. B. C. 11-19-48

MOTION FOR JUDGMENT BY DEFAULT

FARMERS & MERCHANTS BANK OF
FOLEY, ALABAMA, a CORPORATION,

Plaintiff

vs.

PROGRESS ENGINEERING & DEVELOP-
MENT CORPORATION, INC. an
Alabama Corporation,

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 ONE THOUSAND EIGHT HUN-
DRED FORTY FIVE & 87/100 DOLLARS (\$1,845.87), together with interest
at the rate of six percent (6%) per annum, from April 3, 1948, plus
\$250.00 as attorney's fees.

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
Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

FARMERS & MERCHANTS BANK OF
FOLEY, ALABAMA, A CORPORATION,

Plaintiff

vs.

PROGRESS ENGINEERING & DEVELOP-
MENT CORPORATION, INC., AN
ALABAMA CORPORATION,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

*Filed 11-24-48
A. J. Smith
clerk*

1255