

1287

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
C. Cliff Beck, Owner,

Plaintiff

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs.

HARVEY B. WINN,

AT LAW

Defendant

Comes the Plaintiff by its attorney and moves the Court to render Judgment by Default in the amount of ONE HUNDRED THIRTY ONE & 35/100 DOLLARS (\$131.35) principal, plus interest from the 21st day of June, 1947, plus attorneys fees in the amount of \$25.00.

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

Said Judgment should waive all of exemption.

*Franklin C. ...*  
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

HOME FINANCE,  
C. Cliff Beck, Owner

Plaintiff

vs.

HARVEY B. WYNN,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Filed 4-4-49  
Alice J. Leach  
clerk.

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

You are hereby commanded to summon HARVEY B. WYNN, 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 HOME FINANCE, C. Cliff Beck, owner.

Witness my hand this the 12 day of ~~December~~ <sup>January</sup>, 1948.

Alfred J. Kersch  
Clerk

.....

COMPLAINT

HOME FINANCE, )  
C. Cliff Beck, Owner, )  
Plaintiff )  
vs. )  
HARVEY B. WYNN, )  
Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY ONE & 35/100 DOLLARS (\$131.35), due by promissory note made by him on the 21st day of June, 1947, which sum of money, with interest thereon is still unpaid.

As a part of said note the Defendant agreed to pay all costs of collecting, or securing or attempting to collect or secure this note, including a reasonable attorney's fee.

In, by and as a part of said note, the Defendant waives all right of exemption under the Constitution and Laws of the State of Alabama, or any other 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 October 25, 1948.

He

AFFIDAVIT OF C. CLIFF BECK

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

C. CLIFF BECK, first being duly sworn, deposes and says as follows:

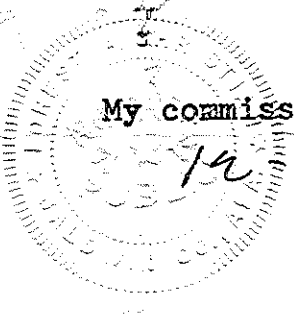
in four installments of \$33.45 each, beginning August 1st, 1947, and due on the first day of each consecutive month thereafter, until full amount is paid with interest at 8% per annum. There is still an unpaid balance of \$131.35, due on this account as of the 25th day of October, 1948, after allowing all due credits.

C. Cliff Beck  
Affiant

Sworn to and subscribed before me, a Notary Public in and for Baldwin County, Alabama, this the 11 day of December, 1948.

My commission expires:

Forrest C. Clavin  
Notary Public



1287

Home Address

Harvey B. Mizer

affidavit  
7  
indebtedness



Suit on Promissory Note

FILED  
JAN 12 1949  
ALICE J. DUCK, Clerk

2. a. c.

Received in Sheriff's Office  
this 13 day of Jan., 1949  
TAYLOR WILKINS, Sheriff

Executed 2-8-49  
By serving copy of  
the within summons  
& complaint on  
Harvey B. Wynn  
Taylor Wilkins, Sheriff  
Edleigh Steadman  
D.S.

ESC

1287

SUMMONS AND COMPLAINT

HOME FINANCE,  
C. CLIFF BECK, OWNER,

PLAINTIFF

VS.

HARVEY B. WYNN,

DEFENDANT

Ever Bank  
Summit, Ala.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW  
FILED

JAN 13 1949

ALICE J. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA