

1308

MOTION FOR JUDGMENT BY DEFAULT

H. KOHNSTAMM & CO., INC.
an Illinois Corporation,

Plaintiff

VS.

KENNETH JOHNSON, Individually,
and doing business as DuBROCK
LAUNDRY AND 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 FOUR HUNDRED SEVENTY & 90/100 DOLLARS (\$470.90⁴), plus interest from the 10th day of September, 1948.

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

Forest A. Christian,
Attorney for Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

Plaintiff

75.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed 4-22-49
Alec J. French
Clerk

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon KENNETH JOHNSON, Individually, and 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 H. KOHNSTAMM & CO., INC., an Illinois corporation.

Witness my hand this the 18 day of February, 1949.

Oliver J. Ruck
Clerk

COMPLAINT

H. KOHNSTAMM & CO., INC.,
an Illinois Corporation,

Plaintiff

vs.

KENNETH JOHNSON, Individually,
and doing business as DuBROCK
LAUNDRY AND CLEANERS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVENTY & 90/100 DOLLARS (\$470.90), together with interest thereon, due from him by account on, to wit: the 10th day of September, 1948, which sum of money, with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVENTY & 90/100 DOLLARS (\$470.90), together with interest thereon, due from him on account state between the Plaintiff and the Defendant on, to wit: the 10th day of September, 1948, which sum of money, together with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SEVENTY & 90/100 DOLLARS (\$470.90), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 10th day of September, 1948, which sum of money, with interest thereon, is still unpaid.

Forest A. Christian
Forest A. Christian, 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 February 9, 1949.

Forest A. Christian
The defendant lives at Fairhope, Alabama.

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

Forest A. Christian

ON THE FIRST OF EACH MONTH WE RENDER STATEMENTS OF ALL BILLS DUE AND NOT DUE AS PER OUR LEDGERS. SHOULD ANY DISCREPANCY BE FOUND, PLEASE NOTIFY US AT ONCE.

If check does not cover full amount of this statement kindly indicate what part it does pay.

AMOUNT TO BE PAID \$ _____
DISCOUNT CLAIMED \$ _____
CHECK ENCLOSED \$ _____

H. KOHNSTAMM & CO., INC.

11 & 13 E. ILLINOIS STREET
CHICAGO 11, ILLINOIS

- Kenneth Johnson
DuBrook Laundry
• P. O. Box 273
• Fairhope, Alabama

PAY LAST
AMOUNT IN
BALANCE
COLUMN.
IF IN RED
INK THE
AMOUNT IS
DUE YOU.



Please detach and return this stub with your remittance.

Your cancelled check will be your receipt.

DATE	DESCRIPTION	CHARGES		CREDITS		BALANCE
1948	BALANCE FORWARD					
6/16		8.65				
6/21		69.86				
6/17		255.51				
7/1		117.81				
9/10		19.07				470.90
STATE OF ILLINOIS) COUNTY OF COOK) ss.						
Walter J. Kohnstamm, being first duly sworn, upon oath deposes and says that he is Assistant Treasurer of H. Kohnstamm & Co., Inc., and that the foregoing account in favor of H. Kohnstamm & Co., Inc., against DuBrook Laundry of Fairhope, Alabama, for the sum of \$470.90 is within the knowledge of affiant just and true; that it is due and unpaid and that all just and lawful offsets, payments, and credits have been allowed.						
<div>W. J. Kohnstamm</div>						
Subscribed and sworn to before me this 9th day of February, 1949.						
<div>Ether Adams</div> <div>Notary Public</div>						
My commission expires Aug. 8, 1949						

Received in Sheriff's Office
this 18 day of Feb, 1949
TAYLOR WILKINS, Sheriff

Executed 3-18 19 49
by sending copy of within Summons and
Complaint on

Kenneth Johnson

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

RF Clear 1308
Copy

SUMMONS AND COMPLAINT

H. KOHNSTAMM & CO., INC.,
an Illinois Corporation,

Plaintiff

vs.

KENNETH JOHNSON, Individually,
and doing business as DuBROCK
LAUNDRY AND CLEANERS,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
FEB 18 1949
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA