

1328

SOUTHERN MUSIC & TELEVISION  
COMPANY, INC., a Corporation,

Plaintiff,

vs.

W. M. McDILL,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT.

Now comes the Plaintiff in the above styled cause and moves the Court to render a Judgment by Default in favor of the Plaintiff and against the Defendant for the amount claimed in Plaintiff's Complaint that has heretofore been filed in said cause. A copy of said Summons and Complaint was served by the Sheriff of Baldwin County, Alabama, on the Defendant, W. M. McDill, on April 9, 1949, and said Defendant has to this date failed to plead, answer or demur to said Complaint.

WHEREFORE, the Plaintiff moves the Court to render a Judgment for the Plaintiff and against the Defendant on promissory waive note in the total sum of \$1,170.00

Dated this 31st day of May, 1949.

Hybart, Chason & Stone,

BY: *J. Hybart*  
Attorney for Plaintiff.

MOTION FOR JUDGMENT BY DEFAULT

SOUTHERN MUSIC & TELEVISION  
COMPANY, INC., a Corporation,

Plaintiff,

vs.

W. M. McDILL,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

Filed May 31st, 1949.

Alice W. Wicks  
Clerk.

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. M. McDill 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 the same, then and there to answer the Complaint of Southern Music & Television Company, Inc., a Corporation.

Witness my hand this 1st day of April, 1949.

Alice L. Luck  
Clerk.

SOUTHERN MUSIC & TELEVISION  
COMPANY, INC., a Corporation,

Plaintiff,

vs.

W. M. McDILL,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant Nine Hundred Twenty-Five and no/100 Dollars (\$925.00) due by Promissory Note made by him on, to-wit September 15, 1947, and payable on or before three (3) months after date of said Note, together with interest thereon from date at the rate of Six percent (6%) per annum.

The Plaintiff avers that in, by and as a part of said Note the Defendant agreed to pay all costs of collecting said Note including a reasonable Attorney's fee if placed in the hands of an Attorney for collection and the Plaintiff further claims of the Defendant the further and additional sum of Two Hundred Dollars (\$200.00) as such reasonable Attorney's fee.

The Plaintiff further avers that in, by and as a part of said Note the Defendant agreed to waive as to this debt all rights to exemption as to real and personal property and of this waiver the Plaintiff now claims the benefit.

Hubert D. Ascare Stone  
Attorneys for Plaintiff.

Received in Sheriff's Office  
this 4 day of April, 1949  
TAYLOR WILKINS, Sheriff

Executed 4-9 1949  
by serving copy of within Summons and  
Complaint on

W. M. McDill

Taylor Wilkins Sheriff  
By Pete Sellers Deputy Sheriff

M1328

SUMMONS AND COMPLAINT

SOUTHERN MUSIC & TELEVISION  
COMPANY, INC., a Corporation,

Plaintiff,

vs.

W. M. McDILL,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

Filed April 1st., 1949.

Alcie J. Leuck  
Clerk.

LAW OFFICES  
HYBART, CHASON & STONE  
BAY MINETTE, ALABAMA