

AMERICAN FRUIT AND PRODUCE
COMPANY, INC., a corporation,

Plaintiff,

VS.

B. F. ALFORD, d/b/a
Fairhope Cafe,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 1351.

MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and moves that he be granted a judgment against the Defendant by default in the amount of One Hundred Eighty-four and 76/100 Dollars (\$184.76) plus interest at the rate of six per cent per annum from the 15th day of March, 1949.


Attorney for Plaintiff

A F F I D A V I T

STATE OF ALABAMA)

MOBILE COUNTY)

Before me, Josephine Pearce a Notary Public
in and for the said County and said State, personally appeared
George E. Heard on this date, who is known to
me and who after being duly sworn did depose and say as follows:

"My name is George E. Heard
and I am the Bookkeeper of the
American Fruit & Produce Company, Inc. As such
officer I have the duty of maintaining direct super-
vision of the business records and books of account
of said corporation. The entries in said books of
account, as made in the regular course of business,
reveal a balance due from B. F. Alford, for goods
sold and delivered to him, on open account, in the
sum of \$184.76. Said books of account further reveal
that this debt has been due from said B. F. Alford
since the 15th day of March, 1949."

And further deponent saith not.

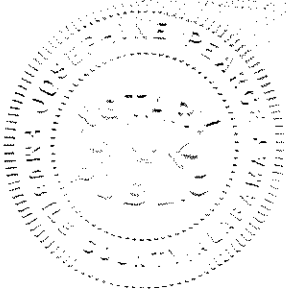
Subscribed and sworn to before
me this the 9th day of September, 1949.

Josephine Pearce
NOTARY PUBLIC.

Notary Public, Mobile County, Ala.

My COMMISSION EXPIRES MARCH 1, 1951

Bonded By New York Co. 112



SUMMONS AND COMPLAINT

THE STATE OF ALABAMA)
BALDWIN COUNTY)

To any sherriff of the State of Alabama:

You are hereby commanded to summon B. F. Alford to appear within thirty (30) days from the service of this complaint in the Circuit Court of Baldwin County, Alabama, then and there to answer the complaint of American Fruit and Produce Company, Incorporated, a corporation.

Witness my hand this the 17th day of ^{May}~~April~~, 1949.

Wesley W. Smith
Clerk.

COMPLAINT

American Fruit & Produce)
Company, Inc., a corporation,)
Plaintiff,)
-vs-)
B. F. Alford, d/b/a Fairhope Cafe,)
Defendant.)

IN THE CIRCUIT COURT
FOR BALDWIN COUNTY,
ALABAMA.

COUNT ONE

The plaintiff claims of the defendant One Hundred Eighty Four and 76/100 (\$184.76) Dollars, due from him by account on the 15th day of March, 1949, which sum of money with the interest thereon, is still due and unpaid.

J. J. Herson Bennett
Attorney for Plaintiff.

NO. 1351

IN THE CIRCUIT COURT
FOR
BALDWIN COUNTY, ALA.

AMERICAN FRUIT AND
PRODUCE COMPANY, INC.,
a corporation,
 plaintiff.

• **VS** •

B. F. ALFORD, d/b/a
Fairhope, Cafe,
defendant.

SUMMONS AND COMPLAINT

Filed in my office on the
17th day of April, *May*
1949.

Deeprouch
Clerk.

Defendant lives in Fairhope
and runs Fairhope Bus Station

J. Jefferson Bennett,
Attorney at Law,
Fairhope, Alabama.

Received in Sheriff's Office
this 17 day of May, 1941
TAYLOR WILKINS, Sheriff

by serving copy of within Summons and
Complaint on _____ 5-18-19 49

Complaint on

B. F. Alford

By Lyle Wilkin Sheriff
W. F. Hall Deputy Sheriff