

MOTION FOR JUDGMENT BY DEFAULT

FAIRBANKS, MORSE & CO.,

PLAINTIFF

VS.

ROY BEESLEY, INDIVIDUALLY,  
AND DOING BUSINESS AS  
BEESLEY PLUMBING COMPANY,

DEFENDANT,

IN THE CIRCUIT COURT OF

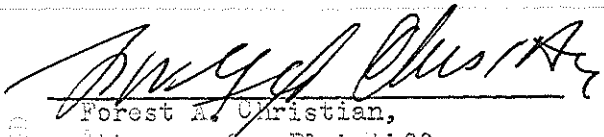
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1618

Comes the Plaintiff, by its attorney, and moves the Court to render Judgment by Default in the amount of FOUR HUNDRED SIXTY FIVE & 74/100 DOLLARS (\$465.74), principal, plus accrued interest in the amount of Twenty-five Dollars (\$25.00), for a total of FOUR HUNDRED NINETY & 74/100 DOLLARS (\$490.74) against the Defendant.

There was attached to the original complaint an affidavit of a competent witness sworn to before a Notary Public.

  
Forest A. Christian,  
Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

FAIRBANKS, MORSE & CO.

PLAINTIFF

VS.

ROY BEESLEY, INDIVIDUALLY, AND  
DOING BUSINESS AS BEESLEY,  
PLUMBING COMPANY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - CASE NO. 1618

FILED

APR 14 1951

ALICE J. DUCK, Clerk

Alfred Morse & Co. is a corporation organized under the laws of the State of Alabama and is engaged in the business of selling and distributing various kinds of hardware and building materials. It is the policy of the corporation to sell its goods on credit to its customers. The corporation has a long and successful record of business and is well known in the community. It is the policy of the corporation to sell its goods on credit to its customers. The corporation has a long and successful record of business and is well known in the community. It is the policy of the corporation to sell its goods on credit to its customers. The corporation has a long and successful record of business and is well known in the community.

Very truly yours,  
J. B. Duck  
Clerk

APR 14 1951

BY THE COURT

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to Summon, ROY BEESLEY, individually, and doing business as BEESLEY PLUMBING COMPANY, to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against ROY BEESLEY, individually, and doing business as BEESLEY PLUMBING COMPANY, by FAIRBANKS, MORSE & CO.

WITNESS my hand this the 1st day of March, 1951.

W. J. Chambers  
Clerk

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COMPLAINT

FAIRBANKS, MORSE & CO.,  
Plaintiff  
vs:  
ROY BEESLEY, Individually,  
and doing business as  
BEESLEY PLUMBING COMPANY,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY FIVE & 74/100 DOLLARS (\$465.74), together with interest thereon, due from him by account on, to wit: April 20, 1950, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY FIVE & 74/100 DOLLARS (\$465.74), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: April 20, 1950, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY FIVE & 74/100 DOLLARS (\$465.74), together with interest thereon, due from him for merchandise, goods, and chattels sold by the Plaintiff to the Defendant on to wit: the 20th day of April, 1950, which sum of money, with interest thereon, is still unpaid.

W. J. Chambers  
Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 3rd day of January, 1951. The affidavit is attached to the original only, but copies of the itemized statement are attached to the original and copy of complaint to be served on Defendant.

W. J. Chambers

A F F I D A V I T

State of Louisiana, Parish of Orleans, before me, the undersigned authority in and for said State and Parish, personally appeared Chas. R. Even, who being first duly sworn, deposes and says that he has personal knowledge of the attached account of Fairbanks, Morse & Co. against Beesley Plumbing Company, in the sum of \$465.74, and that same is just, true and correct and is past due and that no part thereof has been paid or satisfied, and there are no offsets of counter claims thereto.

Chas. R. Even

Subscribed and sworn to before me on this the 3<sup>rd</sup> day of

January, 1951.

Notary Public  
Commission Expires  
at death

**FAIRBANKS, MORSE & CO.**

1000 ST. CHARLES AVENUE

NEW ORLEANS 13. LA.

CUSTOMER  
NUMBER

PHONED

INVOICE NO. C-34486

REQ. NO.  
OR DATE

6/6/49

INVOICE DATE 6/6/49

MAIL  
TOBEESELY PLUMBING COMPANY  
FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

SPECIAL MARKING AND SHIPPING INSTRUCTIONS

DATE  
SHIPPED

6/6/49

SHIPPED TO BEESELY PLUMBING COMPANY  
AND FOLEY, ALABAMA  
DESTINATION

TERMS

2% 10 DAYS NET 30

SALESMAN

WALLACE

SHIPPED VIA FRT COLLECT

COLLECT

PREPAID

DATE ENT.

6/6/49

SHIPPED FROM NOLA

F.O.B. NOLA

BACK ORDERED	QUANTITY	DESCRIPTION	UNIT PRICE		AMOUNT
	2	OUTFITS #250 M 30			
	3	OUTFITS #649 M 30	95.30	190.60	
	1	OUTFIT #700 M 42	112.00	336.00	
				130.50	
				657.10	
		PLUS FRT AND HANDLING CHARGES		25/10%	443.54
					19.70
					463.24

OUR SALESMEN ARE IN NO CASE ALLOWED TO COLLECT MONEY OR TO MAKE DRAFT ON US WITHOUT WRITTEN AUTHORITY.  
 ALL CLAIMS FOR SHORTAGE OR OTHER CAUSES MUST BE MADE WITHIN TEN DAYS AFTER RECEIPT OF GOODS.  
 RAILROAD COMPANY'S RECEIPT FOR MERCHANDISE IN GOOD ORDER CONSTITUTES DELIVERY, AFTER WHICH OUR RESPONSIBILITY CEASES.  
 ITEMS MARKED "B. O." WILL BE SHIPPED AS SOON AS POSSIBLE.

**FAIRBANKS, MORSE & CO.**

1000 ST. CHARLES AVENUE

NEW ORLEANS 13. LA.

CUSTOMER  
NUMBER LETTER  
6/14/49

INVOICE NO. C-35344

REQ. NO.  
OR DATE

INVOICE DATE 6/16/49

MAIL  
TOBEESEY PLUMBING COMPANY  
FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

SPECIAL MARKING AND SHIPPING INSTRUCTIONS

DATE  
SHIPPED 6/16/49

SHIPPED TO SAME

AND

TERMS NET 30 DAYS

DESTINATION

SALESMAN S&amp;O

SHIPPED VIA P POST

COLLECT

PREPAID

DATE ENT. 6/15/49

SHIPPED FROM NOLA

F.O.B. NOLA

BACK ORDERED	QUANTITY	DESCRIPTION	UNIT PRICE		AMOUNT
	1	46B ROTOR HOUSING DRIVEN CONE  FOR 24A POWER MOWER	4.60 P POST	20%	3.68 .31 <hr/> 3.99

OUR SALESMEN ARE IN NO CASE ALLOWED TO COLLECT MONEY OR TO MAKE DRAFT ON US WITHOUT WRITTEN AUTHORITY.  
 ALL CLAIMS FOR SHORTAGE OR OTHER CAUSES MUST BE MADE WITHIN TEN DAYS AFTER RECEIPT OF GOODS.  
 RAILROAD COMPANY'S RECEIPT FOR MERCHANDISE IN GOOD ORDER CONSTITUTES DELIVERY, AFTER WHICH OUR RESPONSIBILITY CEASES.  
 ITEMS MARKED "B. O." WILL BE SHIPPED AS SOON AS POSSIBLE.

**FAIRBANKS, MORSE & CO.**

1000 ST. CHARLES AVENUE

NEW ORLEANS 13, LA.

CUSTOMER  
NUMBER LETTER

INVOICE NO. C-35363

REQ. NO.  
OR DATE

6/14/49

INVOICE DATE 6/16/49

MAIL  
TOBEESLEY PLUMBING COMPANY  
FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

SPECIAL MARKING AND SHIPPING INSTRUCTIONS

DATE  
SHIPPED 6/16/49

SHIPPED TO SAME

AND

TERMS NET 30 DAYS

DESTINATION

SALESMAN S&amp;O

SHIPPED VIA P POST

COLLECT

PREPAID

DATE ENT. 6/16/49

SHIPPED FROM NOLA

F.O.B. NOLA

BACK ORDERED	QUANTITY	DESCRIPTION	UNIT PRICE		AMOUNT
	1	51 FRICTION CONE  FOR 24A POWER MOWER	10.50	20% P POST	8.40 .25 <hr/> 8.65

OUR SALESMEN ARE IN NO CASE ALLOWED TO COLLECT MONEY OR TO MAKE DRAFT ON US WITHOUT WRITTEN AUTHORITY.  
 ALL CLAIMS FOR SHORTAGE OR OTHER CAUSES MUST BE MADE WITHIN TEN DAYS AFTER RECEIPT OF GOODS.  
 RAILROAD COMPANY'S RECEIPT FOR MERCHANDISE IN GOOD ORDER CONSTITUTES DELIVERY, AFTER WHICH OUR RESPONSIBILITY CEASES.  
 ITEMS MARKED "B. O." WILL BE SHIPPED AS SOON AS POSSIBLE.

**FAIRBANKS, MORSE & CO.**

1000 ST. CHARLES AVENUE

NEW ORLEANS 13. LA.

CUSTOMER  
NUMBER VERBALLY TO JS  
1/15/49

INVOICE NO. C-37579

REQ. NO.  
OR DATE

INVOICE DATE 7/19/49

MAIL  
TOBEESELY PLUMBING COMPANY  
FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

SPECIAL MARKING AND SHIPPING INSTRUCTIONS

DATE  
SHIPPED 7/19/49SHIPPED TO BEESELY PLUMBING COMPANY  
AND  
FOLEY, ALABAMA  
DESTINATION

TERMS 2% 10 DAYS NET 30

SALESMAN WALLACE

SHIPPED VIA FRT COLLECT

COLLECT

PREPAID

DATE ENT. 7/18/49

SHIPPED FROM NOLA

F.O.B. NOLA

BACK ORDERED	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	2	MODEL 20 HB POWER MOWERS COMPLETE WITH B AND S ENGINES	115.00	230.00

OUR SALESMEN ARE IN NO CASE ALLOWED TO COLLECT MONEY OR TO MAKE DRAFT ON US WITHOUT WRITTEN AUTHORITY.  
 ALL CLAIMS FOR SHORTAGE OR OTHER CAUSES MUST BE MADE WITHIN TEN DAYS AFTER RECEIPT OF GOODS.  
 RAILROAD COMPANY'S RECEIPT FOR MERCHANDISE IN GOOD ORDER CONSTITUTES DELIVERY, AFTER WHICH OUR RESPONSIBILITY CEASES.  
 ITEMS MARKED "B. O." WILL BE SHIPPED AS SOON AS POSSIBLE.

# FAIRBANKS, MORSE & CO.

BRANCH NEW ORLEANS DATE 7/7/49

CUSTOMER'S NO. \_\_\_\_\_ INVOICE NO. C-28812

REQ. NO. \_\_\_\_\_ OR DATE \_\_\_\_\_ INVOICE DATE \_\_\_\_\_

MAIL  
TO

BEESLEY PLUMBING COMPANY

FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

REGISTER NO.	VOUCHER NO.
F. O. B. CHECKED	
TERMS APPROVED	PRICE APPROVED
CALCULATIONS CHECKED	
TRANSPORTATION	
FREIGHT BILL NO.	AMOUNT
MATERIAL RECEIVED	
DATE	SIGNATURE
SATISFACTORY AND APPROVED	
ADJUSTMENTS	
ACCOUNTING DISTRIBUTION	
AUDITED	FINAL APPROVAL

## CREDIT MEMORANDUM

WE CREDIT YOUR ACCOUNT AS PER DETAILS BELOW:

		UNIT PRICE	AMOUNT
1	WATER SYSTEM 1/2 HP MODEL 502M42	178.00	120.15
		25/10% FRT CHARGES	4.00
			<u>124.15</u>

# FAIRBANKS, MORSE & CO.

BRANCH NEW ORLEANS DATE 4/20/50  
CUSTOMER'S NO. \_\_\_\_\_ INVOICE NO. C-34456  
REQ. NO. \_\_\_\_\_ OR DATE \_\_\_\_\_ INVOICE DATE \_\_\_\_\_

MAIL  
TO

BESLEY PLUMBING COMPANY

FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

REGISTER NO.	VOUCHER NO.
F. O. B. CHECKED	
TERMS APPROVED	PRICE APPROVED
CALCULATIONS CHECKED	
TRANSPORTATION	
FREIGHT BILL NO.	AMOUNT
MATERIAL RECEIVED	
DATE	SIGNATURE
SATISFACTORY AND APPROVED	
ADJUSTMENTS	
ACCOUNTING DISTRIBUTION	
AUDITED	FINAL APPROVAL

## CREDIT MEMORANDUM

WE CREDIT YOUR ACCOUNT AS PER DETAILS BELOW:

			UNIT PRICE		AMOUNT
2	1/4 HP HORZ JET PUMPS		76.00	152.00	
				25/10%	102.60
			PLUS FRT.		3.60
					106.20

# FAIRBANKS, MORSE & CO.

BRANCH NEW ORLEANS

DATE 4/20/50

CUSTOMER'S NO. \_\_\_\_\_

INVOICE NO. C-34486

REQ. NO.  
OR DATE \_\_\_\_\_

INVOICE DATE \_\_\_\_\_

MAIL  
TO

BEESELY PLUMBING COMPANY

FOLEY, ALABAMA

FOR CUSTOMER'S USE ONLY

REGISTER NO.	VOUCHER NO.
F. O. B. CHECKED	
TERMS APPROVED	PRICE APPROVED
CALCULATIONS CHECKED	
TRANSPORTATION	
FREIGHT BILL NO.	AMOUNT
MATERIAL RECEIVED	
DATE	SIGNATURE
SATISFACTORY AND APPROVED	
ADJUSTMENTS	
ACCOUNTING DISTRIBUTION	
AUDITED	FINAL APPROVAL

## CREDIT MEMORANDUM

WE CREDIT YOUR ACCOUNT AS PER DETAILS BELOW:

			UNIT PRICE		AMOUNT
		TO ALLOW CREDIT ON ABOVE INVOICE FOR OVER CHARGE ON ONE 700 M 43 PUMP			
		<u>BILLED:</u>			
1		700 M 42 PUMP	130.50	25/10%	88.09
		<u>CORRECT:</u>			
1		700 M 42 PUMP	116.00	25/10%	78.30
					<u>9.79</u>

Received in Sheriff's Office  
this 1 day of March 1951  
TAYLOR WILKINS, Sheriff

Executed March 7 1951  
by serving copy of within Summons and  
Complaint on

Roy Beesley

Taylor Wilkins Sheriff  
by H. F. Hall Deputy Sheriff

ND 1618  
RECORDED

SUMMONS AND COMPLAINT

FAIRBANKS, MORSE & CO.

Plaintiff

VS:

ROY BEESLEY, Individually,  
and doing business as  
BEESLEY PLUMBING CO.

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 1 1951

ALICE J. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA