

1400

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 CO., 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 CHAS. A. BORN COMPANY.

Witness my hand this the 3rd day of September, 1949.

Reich L. Reich
Clerk

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COMPLAINT

CHAS. A. BORN COMPANY,)	
)	
Plaintiff)	IN THE CIRCUIT COURT OF
)	
vs.)	THE TWENTY EIGHTH JUDICIAL
)	
ROY BEESLEY, Individually, and)	CIRCUIT OF ALABAMA
doing business as BEESLEY)	
PLUMBING CO.,)	AT LAW
)	
Defendant)	

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY EIGHT & 14/100 DOLLARS (\$348.14), together with interest thereon, due from him by account on, to wit: the 23rd day of July, 1948, which sum of money, with interest thereon, is still unpaid.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY EIGHT & 14/100 DOLLARS (\$348.14), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 23rd day of July, 1948, which sum of money, with interest thereon, is still unpaid.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY EIGHT & 14/100 DOLLARS (\$348.14), together with interest, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 23rd day of July, 1948, which sum of money, with interest thereon, is still unpaid.

Frank A. Chavis
Attorney for Plaintiff

There is attached hereto and made a part hereof an affidavit as to the amount of this claim, sworn to before a Notary Public, which shows the amount owed on this claim on August 23, 1949.

Frank A. Chavis

STATE OF FLORIDA
COUNTY OF ESCAMBIA

Now comes Bleeker Born, who on being sworn
deposeth and sayeth as follows:

That he is one of the two proprietors of the
Chas. A. Born Company, Plumbing and Heating Supplies of
217 West Garden Street, Pensacola, Florida. That the other
partner in said venture is Clara A. Born. That he is the
manager and approves all of the sales of the company and
has a personal knowledge of the accounts due the company.

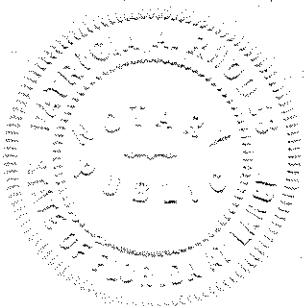
That he has delivered goods and materials to the
Beesley Plumbing Company of Foley, Alabama, and in particular
to Roy Beesley of said company. That the last transaction
on this account took place on the 23rd day of July,
1948. That the balance of the debt is \$348.14 after allowing
all due credits. That it is the custom of the company to
charge interest on all past due accounts of six percent per
annum. That no payments on principal or interest have been
made that would affect the above stated debt. That he has
regularly presented this account for payment to the Beesley
Plumbing Company, but that despite his demands they have not
paid any of the above stated debt. That there has been no
protest of the amount due at any time before the execution
of this affidavit.

Bleeker Born

Sworn to and subscribed before me this 23rd day
of August, 1949.

Patricia A. Rhodes
Notary Public

My commission expires: Aug. 29, 1950



Received in Sheriff's Office
this 3 day of Sept, 1949
TAYLOR WILKINS, Sheriff

Executed 9-14 19 49
by serving copy of within Summons and
Complaint on

Roy Beesley

Taylor Wilkins Sheriff
By Edw. H. Steadman Deputy Sheriff

9-16-49
no 1400

SUMMONS AND COMPLAINT

CHAS. A. BORN COMPANY,

Plaintiff

vs.

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

Defendant

IN THE CIRCUIT COURT OF
THE TWENTY EIGHTH JUDICIAL
CIRCUIT OF ALABAMA

AT LAW

FILED
SEP 3 1949
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

CHAS. A. BORN COMPANY,

Plaintiff

VS.

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

Defendant

IN THE CIRCUIT COURT OF

THE TWENTY EIGHTH JUDICIAL

CIRCUIT OF ALABAMA

AI IW

Comes the Plaintiff by its attorney and moves the Court to render Judgment by Default against the Defendant in the principal amount of THREE HUNDRED FORTY EIGHT & 14/100 DOLLARS (\$348.14), together with interest from the 23rd day of July, 1946.

There is on file an affidavit by an officer of the plaintiff, sworn to before a notary public as to the amount of the indebtedness.

James H. Chin
Attorney for Plaintiff

Attorney for Plaintiff

ALICE J. DUCK, Clerk

OCT 26 1949

FILED

Defendant

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

vs.

Plaintiff

CHAS. A. BORN COMPANY,

MOTION FOR JUDGMENT BY DEFAULT

1400