

SUMMONS

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to summon W. A. REYNOLDS, 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 JOHNNY J. MILLER doing business as MILLERS GROCERY & FEED STORE.

WITNESS my hand this the 29th day of October, 1949.

W. J. March
Clerk

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COMPLAINT

JOHNNY J. MILLER, doing business
as MILLERS GROCERY & FEED STORE,

Plaintiff

vs.

W. A. REYNOLDS,

Defendant

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA, AT LAW

The Plaintiff claims of the Defendant TWO HUNDRED TWENTY EIGHT & 54/100 DOLLARS (\$228.54), due from him by account on, to wit: the 5th day of June, 1947, which sum of money, with interest thereon, is still unpaid.

Forney C. Lewis
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 26th day of October, 1949.

Forney C. Lewis

The Defendant lives at Lillian, Alabama.

AFFIDAVIT OF JOHNNY J. MILLER

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

JOHNNY J. MILLER, first being duly sworn, deposes and says as follows:

My name is JOHNNY J. MILLER; I am the owner of Millers Grocery and Feed Store, Elberta, Alabama, and as such I clerk in my own store and keep all of the accounts of the store.

At various times during the year 1947, I, personally, sold various items of feed and grocers to W. A. REYNOLDS of Lillian, Alabama, which were charged by W. A. REYNOLDS, to wit: On April 1, 3, 8, 12, 28, and 29, and on May 1 and 5, 1947, which total the amount of TWO HUNDRED TWENTY EIGHT & 34/100 DOLLARS (\$228.34).

The original sales slips are attached and made a part hereof. He has made no payments of any kind on this account and the balance remains at TWO HUNDRED TWENTY EIGHT & 34/100 DOLLARS (\$228.34), after allowing all just credits. These accounts were due and payable thirty (30) days after the date of each sale.

Johnny J. Miller
Affiant

Sworn to and subscribed before me a Notary Public in and for Baldwin County, Alabama, this the 26th day of October, 1949.

My commission expires:
12/27/49

Samuel C. Clark
Notary Public

4-11-50

Received in Sheriff's Office
this 27 day of Oct. 1949
TAYLOR WILKINS, Sheriff

Executed 4-11 1950
by serving copy of within Summons and
Complaint on

Taylor Wilkins Sheriff
By P. L. Smith Sheriff

7701426

SUMMONS AND COMPLAINT

JOHNNY J. MILLER, doing business
as MILLER'S GROCERY & FEED STORE,
Plaintiff

vs.

W. A. REYNOLDS,
Defendant

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA, AT LAW

FILED
OCT 27 1949
ALICE L. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

JOHNNY J. MILLER, doing business
as MILLER'S GROCERY & FEED STORE,

Plaintiff

vs.

W. A. REYNOLDS,

Defendant

IN THE CIRCUIT COURT OF THE

TWENTY EIGHTH JUDICIAL CIRCUIT

OF ALABAMA, AT LAW

Comes the Plaintiff by his attorney and moves the Court to render judgment by default against the defendant in the amount of TWO HUNDRED TWENTY EIGHT & 34/100 DOLLARS (\$228.34), plus interest from the fifth day of June, 1947, together with the costs, the defendant, having not answered this cause after being served for more than thirty days and ^{PLAINTIFF holding} filed an affidavit, sworn to before a Notary Public, with the original complaint.

W. G. Chisley
Attorney for Plaintiff

1426

MOTION FOR JUDGMENT BY DEFAULT

JOHNNY J. MILLER, doing business
as MILLERS GROCERY & FEED STORE,

Plaintiff

vs:

W. A. REYNOLDS,

Defendant

IN THE CIRCUIT COURT OF THE
TWENTY EIGHTH JUDICIAL CIRCUIT
OF ALABAMA, - AT LAW

FILED

MAY 13 1950

ALICE J. DUCK, Clerk

1426
2/14/50

RECEIVED
MAY 13 1950
CIRCUIT COURT
JUDICIAL CIRCUIT
ALABAMA
AT LAW

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ALABAMA
AT LAW

1426

MILLERS
 FEED, GROCERIES AND MARKET
 Phone 512
 Elberta, Ala., 4-1-7 194

Name Chief Reynolds
 No. Chief Reynolds
 Reg. No. Clerk ACCOUNT FORWARDED

4	Cow Chow	457	1828
5	Onion	517	4930
	Tax	98	
		50.28	
	eggs	1.00	
28	Chy	49.28	

Your account stated to date. If error is found return at once.

MILLERS
 FEED, GROCERIES AND MARKET
 Phone 512
 Elberta, Ala., 4-1-7 194

Name Chief Reynolds
 No. Chief Reynolds
 Reg. No. Clerk ACCOUNT FORWARDED

2	Cow Chow	457	9.14
7	Onion	507	10.14
			19.28
			39
42			19.67

Your account stated to date. If error is found return at once.

Date 4-18-1947

M Chief Reynolds
 No. Chief Reynolds
 Reg. No. Clerk ACCOUNT FORWARDED

1			
2	Cow Chow		
3			
4		467	
5	Onion	497	
6			
7			
8		9.64	
9		19	
10			
11			
12		9.83	
13			
14	40 Chy		
15			

Q Your account stated to date. If error is found, return at once.

.00 *
 .00 *
 1 4 1.96
 1 0.68
 7.38
 6 8.32
 2 2 8.34 *

Date 4-28-7 1947

M Chief Reynolds
No. _____

Reg. No.	Clerk	ACCOUNT FORWARDED
1		
2	2 Bells	04
3		
4	spray	1.75
5		
6		
7		1.79
8		
9		
10		
11		
12		
13		
14		
15	30	Chy

Q Your account stated to date. If error is found, return at once.

Date 4-12-7 1947

M Chief Reynolds
No. _____

Reg. No.	Clerk	ACCOUNT FORWARDED
1		
2	1/2 Onions	
3		
4	@ 497	29.82
5		
6	4 Cow Chow	
7	@ 467	18.68
8		
9	1 Lard	
10		5.57
11	@ 557	
12		54.07
13		
14		1.08
15	1 Chy	

Q Your account stated to date. If error is found, return at once.

MILLERS

FEED, GROCERIES AND MARKET

Phone 512
Elberta, Ala., 5-1-7 1947

Name Mr. Reynolds
No. _____

Reg. No.	Clerk	ACCOUNT FORWARDED
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15	6	Chy

Your account stated to date. If error is found return at once.

Date 4-29-7 1947

M W.A. Reynolds
No. _____

Reg. No.	Clerk	ACCOUNT FORWARDED
1		
2	1 Spray	
3		
4		
5		55
6		1
7		
8		
9		56
10		
11		
12		
13		
14		
15	21	Chy

Q Your account stated to date. If error is found, return at once.

5-5-1947

M Chief Reynolds

No. Chief Reynolds

Reg. No.	Clerk	Account Forwarded
1		
2	1 Shorts	367
3		
4		
5	1 B ham	357
6		
7		724
8		14
9		
10		738
11		
12		
13		
14		
15		

45

Your account stated to date. If error is found, return at once.

MILLERS
FEED, GROCERIES AND MARKET

Phone 512 5-1-1947
Elberta, Ala.

Name Mr. Reynolds

No. _____

Reg. No.	Clerk	ACCOUNT FORWARDED
8	Smoked	
	487	
		3876
6	corn chow	
	467	
		2802
		66.98
		137
		68.32
1		

Your account stated to date. If error is found return at once.