

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERT STEWART 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 ALLEN DENBY, doing business as DENBY-TURNER COMPANY.

WITNESS my hand this 9th day of February, 1950

W. J. [Signature]
Clerk of the Circuit Court.

ALLEN DENBY, doing business
as DENBY-TURNER COMPANY,
Plaintiff,

vs.

ROBERT STEWART,
Defendant.

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA,

AT LAW.

C-O-M-P-L-A-I-N-T

1. The Plaintiff claims of the Defendant the sum of ~~Thirty-five and No/100 Dollars (\$35.00)~~ due on a promissory note made by the Defendant on, to-wit, March 22, 1949, and payable to the Plaintiff on April 22, 1949, which note is the property of the Plaintiff, and together with the interest thereon, is still due and unpaid.

2. The Plaintiff claims of the Defendant the further sum of Forty and No/100 Dollars (\$40.00) due on a promissory note made by the Defendant on, to-wit, March 22, 1949, and payable to the Plaintiff on May 22, 1949, which note is the property of the Plaintiff, and together with the interest thereon, is still due and unpaid.

3. The Plaintiff further avers that in and by the terms and provisions of the said notes the Defendant waived all rights of exemptions as to these debts, and agreed to pay a reasonable attorney's fee for the collection of the same, which attorney's fee the Plaintiff alleges to be Twenty-five Dollars (\$25.00) and which he herewith claims.

James P. McMurphy
Attorney for Plaintiff

RECEIVED IN OFFICE

This 1 day of March 1950
L. L. ARMSTRONG, Sheriff
Washington County, Ala.
H. S. Sack D.S.

EXECUTED

This 6 day of March 1950
by serving a copy of the
within on Robert Stewart
L. L. ARMSTRONG, Sheriff
Washington County, Ala.
H. S. Sack

RECORDED

1460

294

ALLEN DENBY, doing business
as DENBY-TURNER COMPANY,
Plaintiff,

vs.

ROBERT STEWART,
Defendant.

COMPLAINT

FILED

FEB 9 1950

ALICE J. DUCK, Clerk

Received in Sheriff's Office
this 7 day of Feb, 1950
TAYLOR WILKINS, Sheriff

by serving a copy of within Summons and
Complaint on

Robert Stewart

By H. S. Sack Deputy Sheriff

ALLEN DENBY, doing business
as Denby-Turner Company,
Plaintiff,

vs.

ROBERT STEWART,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

No. 1460

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff and shows unto the Court that the Complaint in this cause was filed on February 9, 1950, and that a copy of the Complaint and Summons was served upon the Defendant by the Sheriff of Washington County, Alabama, on the 6th day of March, 1950, and that to the date hereof the Defendant has failed to appear and demur, plea, or otherwise answer to the Complaint.

WHEREFORE, the Plaintiff moves the Court to enter a Judgment by Default against the Defendant in this cause.

Dated this 6th day of May, 1950.

James P. McMurphy
Attorney for Plaintiff.

RECORDED

ALLEN DENBY, doing business
as Denby-Turner Company,
Plaintiff,

vs.

ROBERT STEWART,
Defendant.

Motion for Judgment by
Default

1460

Filed: May 6, 1950.

J. J. Mashburn, Jr.
Judge.