

1496

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 GOOD HOUSEKEEPING APPLIANCE CO., INC., a corporation organized and existing under the laws of the State of Alabama.

WITNESS my hand this the 18th day of May, 1950.

David L. Luck
Clerk

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COMPLAINT

GOOD HOUSEKEEPING APPLIANCE
CO., INC., a Corporation

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

COUNT I

The Plaintiff claims of the defendant the sum of ONE THOUSAND EIGHTY THREE & 33/100 DOLLARS (\$1,083.33) due by promissory note made by him on the 1st day of November 1949, and payable on demand, together with interest thereon at the rate of eight per cent (8%) per annum, from the 1st day of November, 1949, until paid. Said note provides for a reasonable attorney's fees which the Plaintiff alleges to be \$150.00.

COUNT II

The Plaintiff claims of the defendant the sum of ONE HUNDRED EIGHTY SIX & 48/100 DOLLARS (\$186.48), due from him by account on the 1st day of November, 1949, which sum of money, with the interest thereon, is still unpaid.

James O. Clark
Attorney for Plaintiff

Received in Sheriff's Office
this 18 day of May 1950
TAYLOR WILKINS, Sheriff

NO 1496

SUMMONS AND COMPLAINT

GOOD HOUSEKEEPING APPLIANCE CO., INC.
a Corporation,

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 5-18-50
A. J. [unclear]
clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Executed 5-19 1950
by serving copy of within Summons and
Complaint on

Roy Beesley

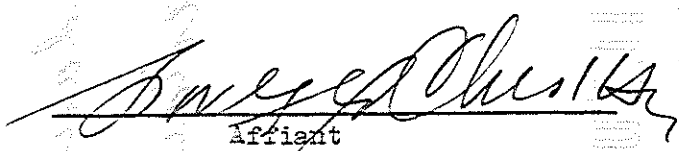
Taylor Wilkins Sheriff
L. L. [unclear] Sheriff

AFFIDAVIT OF FOREST A. CHRISTIAN

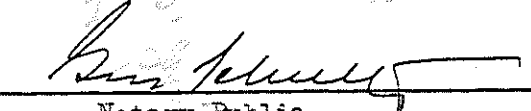
STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

Forest A. Christian, first being duly sworn, deposes and says as follows:

I am a duly licensed practicing attorney of Foley, Alabama; I am familiar with the fees charged by the attorney's of the Baldwin County Bar; I was employed by the Good Housekeeping Appliance Co, Inc., to collect a promissory note in the principal amount of \$1083.33, and the said note provides for a reasonable attorney's fee and that the affiant believes that \$150.00 is a reasonable attorney's fee in this case.


Affiant

Sworn to and Subscribed to
me this the 22nd. day of
December, 1950.


Notary Public

RECEIVED - OFFICE OF THE CLERK

DECEMBER 20 1950

RECEIVED

TO THE HONORABLE THE SENATE AND THE HOUSE OF REPRESENTATIVES

THE HONORABLE THE SENATE AND THE HOUSE OF REPRESENTATIVES
WASHINGTON, D. C.
DECEMBER 20 1950

Goodhouse Keeping
Appliance Co., Inc.

✓

Ray Beasley

affidavit as
to attorney's fees.

FILED

DEC 28 1950

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA
December 27, 1950.

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama.

Dear Mrs. Duck:

Enclosed you will find original copy of the letter dated December 27, 1950, from C. G. Chason, attorney, concerning two cases against Roy Beesley and an affidavit as to reasonable attorney's fees in one of the cases.

As soon as you have filed these, kindly deliver them to Judge Mashburn, since the files are on his desk and he is awaiting these papers in order to render judgment.

I wish you and all the Court Officials a Very Happy New Year.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Forest A. Christian", written in a cursive style.

FOREST A. CHRISTIAN

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

27 December 1950

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Ala.

Dear Mrs. Duck:-

Some time ago it was agreed by the parties in interest that the case of Good Housekeeping Appliance Company, Inc. vs. Roy Beesley, No. 1496, and Gulf Refining Company, Inc. vs. Roy Beesley, No. 1488, should be reduced to judgment in favor of the plaintiff. In order that this may be accomplished, please withdraw my appearance and pleadings in behalf of the defendant in these cases.

Yours very truly,


C. G. Chason

CGC:lu

cc: Forest Christian
Attorney at Law
Foley, Alabama

RECEIVED
FEBRUARY 1950
OFFICE OF THE
ATTORNEY GENERAL

RECEIVED
FEBRUARY 1950
OFFICE OF THE
ATTORNEY GENERAL

RECEIVED
FEBRUARY 1950
OFFICE OF THE
ATTORNEY GENERAL

FILED
DEC 23 1950
ALICE A. BUCK, Clerk

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

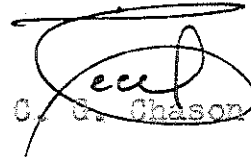
27 December 1950

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Ala.

Dear Mrs. Duck:-

Some time ago it was agreed by the parties in interest that the case of Good Housekeeping Appliance Company, Inc. vs. Roy Beesley, No. 1496, and Gulf Refining Company, Inc. vs. Roy Beesley, No. 1488, should be reduced to judgment in favor of the plaintiff. In order that this may be accomplished, please withdraw my appearance and pleadings in behalf of the defendant in these cases.

Yours very truly,


C. G. Chason

CGC:lu

cc: Forest Christian
Attorney at Law
Foley, Alabama

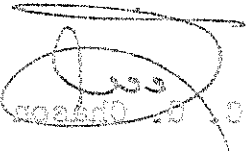
CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA
27 December 1950

Mrs. Alice J. Duck
Clerk of Court
Foley, Alabama

Dear Mrs. Duck:-

Some time ago it was agreed by the parties in interest that the case of Good Housekeeping Appliance Company, Inc. vs. Roy Beasley, No. 1495, and Gulf Refining Company, Inc. vs. Roy Beasley, No. 1488, should be reduced to judgment in favor of the plaintiff. In order that this may be accomplished, please withdraw my appearance and pleadings in behalf of the defendant in these cases.

Yours very truly,



CGC:ld

cc: Forest Christian
Attorney at Law
Foley, Alabama

FILED
DEC 28 1950
ALICE J. DUCK, CLERK

GOOD HOUSEKEEPING APPLIANCE
CO., INC., a corporation,

Plaintiff,

-v-s-

ROY BEESLEY, individually and
doing business as BEESLEY
PLUMBING COMPANY,

Defendant.

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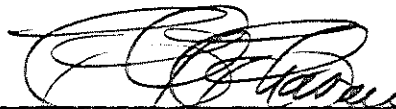
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 1496

Comes the defendant in the above entitled cause and demurs
to the complaint filed in said cause and for grounds of demurrer
assigns separately and severally the following:-

1. Said complaint states no cause of action against the
defendant.



Attorney for Defendant

Defendant demands a trial by
jury:



Attorney for Defendant.

Jury

DEMURRERS TO
BILL OF COMPLAINT

GOOD HOUSEKEEPING APPLIANCE
CO., INC., a corporation,

Plaintiff,

-VS-

ROY BEESLEY, individually
and doing business as
BEESLEY PLUMBING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 1496

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CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

1496

AFFIDAVIT OF F. V. de GRUY

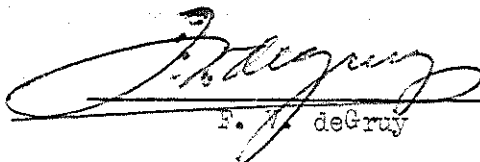
THE STATE OF ALABAMA,

MOBILE COUNTY.

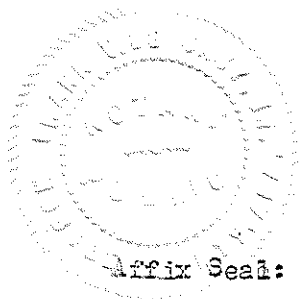
F. V. deGRUY, first being duly sworn, deposes and says as follows:

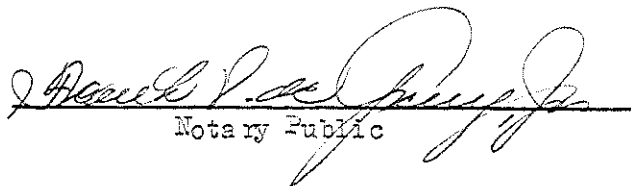
My name is F. V. deGRUY; I am president of GOOD HOUSEKEEPING APPLIANCE CO., INC., which corporation sells household appliances in Mobile, Alabama, and that as such officer I have access and control of the books of said corporation; that the said GOOD HOUSEKEEPING APPLIANCE CO., INC., is the plaintiff in the suit against ROY BEESLEY, Individually, and doing business as BEESLEY PLUMBING CO.; that on November 1, 1949, the said ROY BEESLEY executed a promissory waive note in the amount of ONE THOUSAND EIGHTY THREE & 33/100 DOLLARS (\$1,083.33), which note was due and payable on demand and which provided for interest at eight per cent (8%) per annum, from date until paid; and that said note provided for reasonable attorney's fees; the said affiant further states that no payments have been made on said note, either on the principal or the interest and that the principal balance due on said note remains at ONE THOUSAND EIGHTY THREE & 33/100 DOLLARS (\$1,083.33), and that there is due and payable under said note one year's interest or \$86.67. The affiant further states that he employed Forest A. Christian, Attorney at Law, Foley, Alabama, to collect said note.

The affiant further states that ROY BEESLEY, Individually, and doing business as BEESLEY PLUMBING CO., owes the additional sum of ONE HUNDRED EIGHTY SIX & 48/100 DOLLARS (\$186.48), which is the balance due on a sale of appliances sold to the defendant, and that said balance accrued on November 1, 1949, and remains due and unpaid.


F. V. deGruy

Sworn to and subscribed before me, a Notary Public in and for Mobile County, Alabama, this the 6th day of November, 1950.




Notary Public