

STATE OF ALABAMA
BALDWIN COUNTY

1512
IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lawrence Alexander 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 Wilmer F. Pope, individually and doing business as Fairhope Grocery & Market.

Witness my hand this 13th day of June, 1950.

W. F. Pope
Clerk.

COMPLAINT:

WILMER F. POPE, individually
and doing business as FAIRHOPE
GROCERY & MARKET,

Plaintiff,

vs.

LAWRENCE ALEXANDER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant Three Hundred Forty-seven and 77/100 Dollars (\$347.77) due from him by account on, to-wit, the 3rd day of April, 1950, which sum of money, together with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Two Hundred Forty-seven and 77/100 Dollars (\$247.77) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 3rd day of April, 1950, which sum of money, together with the interest thereon, is still unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of One Hundred Dollars (\$100.00) for money loaned by the Plaintiff to the

Defendant, on to-wit, the 8th day of April, 1950, which sum of money, together with the interest thereon is still unpaid.

Chason & Stone

By:


Attorneys for Plaintiff.

Received in Sheriff's Office
this 13 day of June 1950
TAYLOR WILKINS, Sheriff

RECORDED WV 1572

SUMMONS AND COMPLAINT

Executed June 22 1950
by serving copy of within Summons and
Complaint on

Lawrence Alexander

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

WILMER F. POPE, individually,
and doing business as FAIRHOPE
GROCERY & MARKET,

Plaintiff,

vs.

LAWRENCE ALEXANDER, Indefinite
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Filed June 13, 1950.

Alice J. Leach
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

WILMER F. POPE, individually
and doing business as FAIRHOPE
GROCERY & MARKET,

Plaintiff,

vs.

LAWRENCE ALEXANDER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff in the above styled cause by its Attorneys, and moves the court to render a judgment by default in favor of the Plaintiff and against the Defendant for the amount claimed in Plaintiff's complaint that has heretofore been filed in this cause.

A copy of said Summons and Complaint was served on the Defendant, Lawrence Alexander, on June 22, 1950, and he has to the date hereof, failed to plead, answer or demur to the said complaint as required by law.

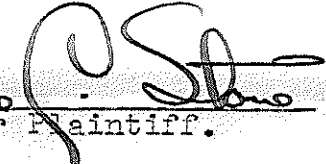
This suit is to recover the sum of \$347.77, together with interest thereon from April 3, 1950, due from the Defendant to the Plaintiff for merchandise, goods and chattels sold to the Defendant by the Plaintiff.

WHEREFORE, the Plaintiff respectfully moves this Honorable Court to render a judgment for the Plaintiff and against the Defendant for the amount sued for, plus interest at the rate of 6%, together with the costs heretofore incurred in this cause.

Respectfully submitted,

Chason & Stone

By: 


Attorneys for Plaintiff.

Civil # 1512

RECORDED

Motion for Judgment
by DeSaut

2/5/1

FILED

AUG 2 1950

ALICE J. DUCK, Clerk

Fairhope, Ala
July 7, 1950

Dear Sir:

In regard to the said account with Mr. Pope. I pay him each week what I can spare. And as I told Mr. Pope I dont intend to sign anything. As I tried to reason with him and I couldn't.

I understand it a cash settlement he wants. Which I wish I could do.

Back to the account when it was made. I told them I didn't know when I could pay for things. So when I went to work they wasn't satisfied for me to pay on the bill. Mr. Pope wanted a cash settlement that I couldn't do. So he told me that he would get it. If he had to take the hard way to get what he wanted.

Yours Truly,
Lawrence M. Alexander

415
11/15/10
11/15/10
11/15/10