

STATE OF ALABAMA)

BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Van H. Nolan, 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 Childress, Bain & Company, a partnership composed of T. E. Childress and James W. Bain.

Witness my hand this 19th day of May, 1951.

Reine L. Seick
Clerk.

COMPLAINT:

CHILDRRESS, BAIN & COMPANY,
A partnership composed of
T. E. Childress and James
W. Bain,

Plaintiff,

vs.

VAN H. NOLAN,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant Six Hundred Dollars (\$600.00) for work and labor done for the Defendant by the Plaintiff on to-wit, the 31st day of July, 1950, at his request, which sum of money with the interest thereon is still unpaid.

CHASON & STONE

BY:

Mahmud P. Stone
Attorneys for Plaintiff.

The Defendant resides at
Government Street Highland,
Mobile, Alabama.

Received 21 Day of May 1951
and on 23 Day of May 1951
I served a copy of the within
on Van H. Nolan

by service on

W. H. HOLCOMBE, Sheriff

By

W. H. Holcombe, D.S.

Received in Sheriff's
this 9 day of May, 1951
TAYLOR WILKINS, Sheriff

CHILDRESS, BAIN & COMPANY,

Plaintiff,

vs.

VAN H. NOLAN,

Defendant.

In The Circuit Court of
Baldwin County, Alabama
Law Side

SUMMONS AND COMPLAINT

FILED
MAY 19 1951
ALICE J. DUCK, Clerk

RECORDED

CHILDRRESS, BAIN & COMPANY,
A partnership composed of
T. E. Childress and James
W. Bain,

Plaintiff,

vs.

VAN H. NOLAN,

Defendant.

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

Comes now the Plaintiff in the above styled cause by its Attorneys and respectfully moves this Honorable Court to enter a Judgment by default against Van H. Nolan, the Defendant herein, and as grounds for said motion says as follows:

That the Summons and Complaint in the above styled cause which was filed on May 19, 1951, was served on the Defendant, Van H. Nolan on the 23rd day of May, 1951, by W. H. Holcombe, Sheriff of Mobile County, Alabama, by H. B. Sanders, Deputy Sheriff, and that more than thirty days have elapsed since said Summons and Complaint was served on the said Defendant and he has failed to plead, answer or demur to the same within that time.

This is a suit for work and labor done for the Defendant by the Plaintiff at his request, which work and labor amounted to \$600.00 and which the Defendant has not paid.

Respectfully submitted,

CHASON & STONE

By: 

RECORDED

MOTION FOR JUDGMENT BY
DEFAULT

CHILDRESS, BAIN & COMPANY,
Plaintiff,

vs.

VAN. H. NOLAN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

NO. 1661.

FILED
SEP 21 1951
ALICE J. DUCK, Clerk