

1701

AFFIDAVIT OF HORACE KENNEDY

THE STATE OF ALABAMA,)

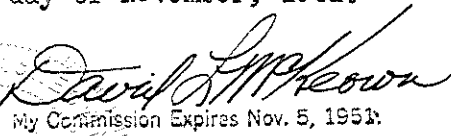
BALDWIN COUNTY.)

HORACE KENNEDY, first being duly sworn, deposes and says as follows:

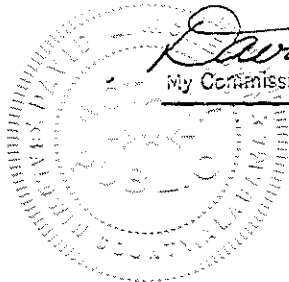
My name is Horace Kennedy; I am the plaintiff in the case of HORACE KENNEDY VS: WALTER DUGGER; the defendant, WALTER DUGGER, purchased fertilizer, soda, and seeds from me on a charge account, the last item of which was purchased on August 31, 1949, there have been no monies paid on this account, and after allowing all just credits, there still remains to be paid on this account, the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest.


HORACE KENNEDY, AFFIANT

Sworn to and subscribed before me,
a Notary Public, in and for Baldwin
County, Alabama, this the 4th
day of November, 1951.


My Commission Expires Nov. 5, 1951.

Notary Public



MOTION FOR JUDGMENT BY DEFAULT

HORACE KENNEDY,

PLAINTIFF

VS:

WALTER DUGGER,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1701

Comes the Plaintiff by his attorney, and moves the Court to render Judgment by Default in the amount of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS(\$353.99), together with interest thereon, against the defendant.

There is attached and made a part of this Motion for Judgment by Default, an affidavit of a competent witness sworn to before a Notary Public.


Attorney for Plaintiff

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

HORACE KENNEDY,

PLAINTIFF

VS:

WALTER DUGGER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 1701

*Filed 11-14-57
A. J. Newell
Clerk*

SUMMONS:

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING: -

YOU ARE HEREBY COMMANDED to summon WALTER DUGGER to appear and plead, answer, or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against WALTER DUGGER, by HORACE KENNEDY.

WITNESS my hand this the 12th day of September, 1951.

Dee J. Smith
Clerk

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COMPLAINT

HORACE KENNEDY,

PLAINTIFF

VS:

WALTER DUGGER,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him by account on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of September, 1951, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

James A. Christ
Attorney for Plaintiff

The Defendant lives at:
Foley, Alabama.

Received in Sheriff's Office
this 12 day of Sept, 1951
TAYLOR WILKINS, Sheriff

Returned 5 day of Oct, 1951
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By W F Hall
Deputy Sheriff

in Fla.

HORACE

KENNEDY,

PLAINTIFF

VS:

WALTER DUGGER,

DEFENDANT

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT

FILED

SEP 12 1951

ANCE L. THOMAS, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

SUMMONS:

THE STATE OF ALABAMA,)
(
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING: -

YOU ARE HEREBY COMMANDED to summon WALTER DUGGER to appear and plead, answer, or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against WALTER DUGGER, by HORACE KENNEDY.

WITNESS my hand this the 12th day of September, 1951.

Henry J. Leitch
Clerk

COMPLAINT

HORACE KENNEDY,

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

VS:

AT LAW

WALTER DUGGER,

DEFENDANT.

COUNT I:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him by account on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of September, 1951, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 99/100 DOLLARS (\$353.99), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of September, 1951, which sum of money, with interest thereon, is still unpaid.

Bruce G. Oliver
Attorney for Plaintiff

The Defendant lives at:
Foley, Alabama.

State, Alabama,
the Defendant have as:

Handwritten signature
HARRISON FOR INTEREST

is still subject.

at: the 1st day of September, 1951, upon and of money, with interest thereon,
marriage, 1951, and children, 1951, by the Defendant to the Defendant on, to
2 22/100 Dollars (\$22.22), together with interest thereon, the sum of \$100.00,
the Plaintiff claims of the Defendant the sum of \$100.00, and interest thereon.

COMPLAINT

September, 1951, upon and of money, with interest thereon, the sum of \$100.00,
count stated between the Plaintiff and the Defendant on, the sum of \$100.00,
22/100 Dollars (\$22.22), together with interest thereon, the sum of \$100.00,
the Plaintiff claims of the Defendant the sum of \$100.00, and interest thereon.

AT

COMPLAINT

DUGGER,
KENNEDY,
PLAINTIFF

DEFENDANT

COMPLAINT

CIRCUIT COURT
COUNTY OF ALABAMA

FILED

SEP 12 1951
ALICE A. DUCK, Clerk

WILLIAM DUGGER

AT

IN

WILLIAM

WILLIAM COUNTY, ALABAMA

WILLIAM DUGGER

IN THE CIRCUIT COURT OF

COMPLAINT

Handwritten signature

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER, Plaintiff, vs. WILLIAM DUGGER, Defendant, 1951.

WILLIAM DUGGER

1961