

1755

A. C. TALBOT, individually
and doing business as
TRAVELER'S SERVICE STATION,

Plaintiff,

vs.

S. W. JACOBS,

Defendant.

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

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff, A. C. Talbot, by his attorneys,
and respectfully moves this court to enter a judgment by default
in favor of the plaintiff and against the defendant in the sum of
One Hundred Sixty-six and 28/100 Dollars (\$166.28, together with
interest thereon from July 30, 1951, and the costs of this suit and
as grounds for said motion says:


1. That the defendant was served with a copy of the Bill
of Complaint in this cause by personal service on January 24, 1952,
and that more than 30 days have elapsed since such service and he
has failed to plead, answer or demur to the said Bill of Complaint.

This is a suit on account for merchandise, goods and
chattels sold by the plaintiff to the defendant for which there is
a balance now due of \$166.28 plus interest from July 30, 1951, and
there was attached to the Bill of Complaint in this cause an
itemized, verified statement of the account sued on.

Respectfully submitted,

CHASON & STONE

By:


Attorneys for the Plaintiff.

166.28
4.6512
6.80
166.28
173.08

RECORDED

A.C. Talbot, ind. and d/b/a
Travelers Service Station

v.

S. W. Jacobs

Motion for Judgment by Default

FILED

APR 10 1952

ALICE J. DUCK, Clerk

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Original for the Plaintiff
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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 S. W. Jacobs 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 A. C. Talbot, individually and doing business as Traveler's Service Station.

Witness my hand this 17th day of January, 1952.

Archie L. Duck
Clerk.

COMPLAINT:

A. C. TALBOT, individually,
and doing business as
TRAVELER'S SERVICE STATION,

Plaintiff,

vs.

S. W. JACOBS,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant One Hundred Sixty-six and 28/100 Dollars (\$166.28) due from him by account on the 30th day of July, 1951, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of One Hundred Sixty-six and 28/100 Dollars (\$166.28) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 30th day of July, 1951, which sum of money, together with the interest thereon, from July 30th, 1951, is still unpaid.

CHASON & STONE

By:

Malone P. Stone, Jr.
Attorneys for the Plaintiff.

There is attached hereto an itemized, verified statement of the account sued on.

Malone P. Stone, Jr.

TRAVELER'S SERVICE STATION

A. C. Talbot, Manager

Itemized statement of S. W. Jacobs' account:

1/31/50	Gas.....	\$ 4.27
2/1/50	Gas.....	4.48
2/2/50	Oil.....	2.00
2/2/50	Grease job.....	1.00
2/2/50	Gas.....	5.27
2/2/50	Gas.....	4.00
2/3/50	Gas.....	2.44
2/4/50	Gas.....	4.70
2/6/50	Gas.....	3.41
2/8/50	Gas.....	5.18
2/8/50	Carton Cigarettes.	1.90
2/9/50	Gas and oil.....	5.60
2/11/50	Gas.....	4.45
2/12/50	Gas.....	3.62
2/14/50	Gas.....	4.19
2/14/50	Gas.....	.93
2/16/50	Gas.....	2.95
2/17/50	Gas.....	.65
2/18/50	Gas.....	4.30
2/20/50	Gas.....	4.40
2/23/50	Gas.....	4.40
2/23/50	Gas, Grease, wash.	5.31
2/23/50	Gas, 1 light bulb.	1.08
2/24/50	Gas.....	1.35
2/25/50	Gas.....	1.55
2/25/50	Gas.....	3.72
2/27/50	Gas.....	1.95
2/28/50	Gas.....	1.74
3/1/50	Gas.....	4.43
3/2/50	Gas.....	3.35
3/2/50	Gas.....	1.48
3/4/50	Gas.....	2.94
3/6/50	Gas and oil.....	3.08
3/8/50	Gas & Cigarettes..	5.20
3/8/50	Gas.....	1.13
3/9/50	Gas and oil.....	7.35
3/11/50	Gas.....	3.65
3/18/50	Gas.....	3.10
3/21/50	Gas.....	2.79
3/22/50	Gas and gum.....	2.77
3/23/50	Gas.....	1.35
3/25/50	Gas.....	3.72
3/25/50	Gas.....	3.10
3/28/50	Gas.....	2.98
3/30/50	Gas.....	4.48
3/31/50	Gas.....	1.10
3/31/50	Gas, oil, grease..	6.19
4/4/50	Gas, cigarettes and gum.....	3.50
4/5/50	Gas.....	3.10
4/6/50	Gas.....	1.55
4/13/50	Gas.....	3.10
Total.....		\$166.28

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public in and for said County and State personally appeared A. C. Talbot, who is known to me and who is known to me to be the owner and operator of Traveler's Service Station, Bay Minette, Alabama, and who, being by me first duly and legally sworn deposes and says that the foregoing itemized statement of account is true and correct and that the same sum shown thereon is unpaid and is due and owing from S. W. Jacobs to him.

A C Talbot

Sworn to and subscribed

before me this 17TH

day of January, 1952.

Mahone C. Smith
Notary Public, Baldwin County, Ala.

this 17 day of Jan 1952
TAYLOR WILKINS, Sheriff

RECORDED

SUMMONS AND COMPLAINT

Executed Jan. 24, 1952
by serving copy of within Summons and
Complaint on

S. W. Jacobs

Taylor Wilkins Sheriff
By V. F. Hall Deputy Sheriff

A. C. TALBOT, individually,
and doing business as
TRAVELER'S SERVICE STATION,

Plaintiff,

vs.

S. W. JACOBS,

Defendant.

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

FILED

JAN 17 1952

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Mills
Lives near
Bon Secour
Ala

AUG 3 1951



T. M. Moss Motor Company

Bigger and Better In Everything

Oldsmobile - Sales and Service - G M C Trucks

TELEPHONE 64

FOLEY, ALABAMA

July 30, 1951

Itemized account of G.M. Mills, Magnolia Springs, Alabama, owing to T.M. Moss Motor Company, Formerly Gordon Motor Company.

DATE	INVOICE	PART AND LABOR	DEBITS	CREDITS	BALANCE
10/30/46	4138	Overhaul Dist. Check Points and Generator set points	3.40		3.40
7/10/47	5000	Spring, bolts nuts washers	18.85		
7/10/47	Paid			18.00	4.25
7/11/47	Paid			85	3.40
11/26/47	6026	Battery	14.25		18.59
12/5/47	6064	Center Bolt, Washers Nuts			
		Misc. Gaskets, Labor	43.42		62.01
1/28/48	6212	Muffler Tail Pipe cable & housing labor	15.10		77.11
1/29/48	Paid			3.25	73.86
2/4/48	6237	Thermostat and oil	5.10		78.96
2/9/48	6258	Bearings, armature labor	13.00		91.91
2/23/48	6303	Valves head gasket labor gasoline	70.10		162.06
3/2/48	6335	Points and labor	1.95		164.01
3/9/48	6349	Gear gasket bolts labor	23.81		187.82
3/24/48		Note signed for Cash	71.46		259.28
4/2/48	17280	Gasoline	2.38		261.66
4/7/48	6439	Brake lining drums labor	50.81		312.47
4/15/48	6456	Master cylinder, fluid switch labor	15.60		328.07
4/26/48	Paid	By Check		72.00	256.07
4/26/48	17744	Gasoline and oil	5.00		261.07
5/8/48	6556	Plugs Bearings Armature labor	15.00		276.07
5/6/48		Check paid on account returned from Bank NO GOOD	72.00		348.07
8/7/48	6854	Tie rod ends labor	2.86		350.93
8/20/48	6926	Brake adjustment	1.00		351.93
5/13/49	Credit	Credit Memo		35.14	316.79

Total Amount owing

\$316.79

This is a true and just statement of the account of G.M. Mills.

T.M. MOSS MOTOR COMPANY

SWORN TO AND SUBSCRIBED BEFORE ME THIS THE 18th day of JANUARY, 1952, by T. M. MOSS AS OWNER OF THE GORDON MOTOR COMPANY.

T.M. Moss Prop.

NOTARY PUBLIC

