

1757

SUMMONS

THE STATE OF ALABAMA. )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON G. M. MILLS, to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed by T. M. MOSS, doing business as GORDON MOTOR COMPANY in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against G. M. MILLS.

WITNESS MY HAND this the \_\_\_\_\_ day of May, 1952.

\_\_\_\_\_  
Clerk

\*\*\*\*\*

T. M. MOSS, doing business as  
Gordon Motor Company,  
Plaintiff

VS.

G. M. MILLS,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

MOTION FOR JUDGMENT BY DEFAULT

Comes the Plaintiff, and moves the Court to render judgment against the Defendant in the principal amount of THREE HUNDRED SIXTEEN & 79/100 DOLLARS (\$316.79), plus THIRTY-SEVEN & 50/100 DOLLARS (\$37.50) interest for a total of THREE HUNDRED FIFTY-FOUR & 29/100 DOLLARS (\$354.29).

There was attached to the original Complaint, an itemized statement of the account verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 13th day of May, 1949. The Defendant having been personally served and failing to answer within thirty days of such service.

*[Signature]*  
Attorney for Plaintiff

RECORDED

GORDON MOTOR COMPANY,  
T. M. MOSS, doing business as

Plaintiff

v.

G. M. MILLS,  
Defendant

Plaintiff

MOTION FOR JUDGMENT BY DEFAULT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

*[Handwritten marks]*

*[Handwritten notes]*



SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

YOU ARE HEREBY COMMANDED to summon G. M. MILLS, to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed by T. M. MOSS, doing business as GORDON MOTOR COMPANY in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against G. M. MILLS.

WITNESS my hand this the 19<sup>th</sup> day of January, 1952.

*Alfred J. ...*  
Clerk

////////////////////////////////////

COMPLAINT

T. M. MOSS, doing business as  
GORDON MOTOR COMPANY,

PLAINTIFF

VS:

G. M. MILLS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTEEN & 79/100 DOLLARS (\$316.79), together with interest thereon, due from him by account on, to wit: the 13th day of May, 1949, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTEEN & 79/100 DOLLARS (\$316.79), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant, on to wit: the 13th day of May, 1949, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTEEN & 79/100 DOLLARS (\$316.79), together with interest thereon, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant, on to wit: the 13th day of May, 1949, which sum of money, with interest thereon, is still unpaid.

*Alfred J. ...*  
Attorney for Plaintiff

There is attached hereto and made a part hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 13th day of May, 1949.

*Alfred J. ...*

Received in Sheriff's Office  
this 12 day of Jan, 1952  
TAYLOR WILKINS, Sheriff

Executed Mar, 12, 1952

By Serving copy on

G. M. Mills

Sheriff

Taylor Wilkins

By

Edleigh Steadham

No. 1757

RECORDED

SUMMONS AND COMPLAINT

T. M. MOSS, DOING BUSINESS AS  
GORDON MOTOR COMPANY

PLAINTIFF

VS:

G. M. MILLS,

DEFENDANT

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA

AT LAW

FILED  
JAN 15 1952

WICK & WICK, Attorneys  
LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA