

1771

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 Al Moses, individually and doing business as Almose Restaurant, Fairhope, Alabama, 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 18th day of March, 1952.

W. F. Pope
Clerk.

COMPLAINT:

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

Plaintiff,

vs.

AL MOSES, individually and
doing business as ALMOSE
RESTAURANT, Fairhope, Alabama,

Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant Three Hundred Nine and 64/100 Dollars (\$309.64) due from him by account on the 31st day of December, 1951, which sum of money with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Three Hundred Nine and 64/100 Dollars (\$309.64) for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 31st day of December, 1951, which sum of money, together with the interest thereon from December 31, 1951, is still unpaid.

CHASON & STONE

By: Marion S. Stone
Attorneys for Plaintiff.

Received in Sheriff's Office
this 18 day of Mar 1952
TAYLOR WILKINS, Sheriff

Executed 3-20 1952
by serving copy of within Summons and
Complaint on

Al Moses

Taylor Wilkins Sheriff

By George Taylor Deputy Sheriff

1771

RECORDED

SUMMONS AND COMPLAINT

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

Plaintiff,

vs.

AL MOSES, individually, and
doing business as ALMOSE
RESTAURANT, Fairhope, Alabama.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED
MAR 18 1952
ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

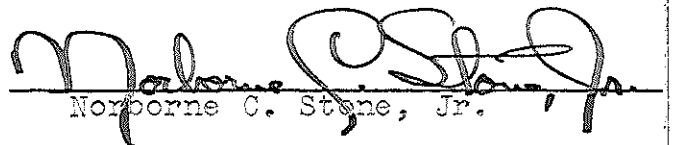
STATE OF ALABAMA

BALDWIN COUNTY

Before me, Alice L. Miller, a Notary Public in and for said County in said State, personally appeared Norborne C. Stone, Jr., who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

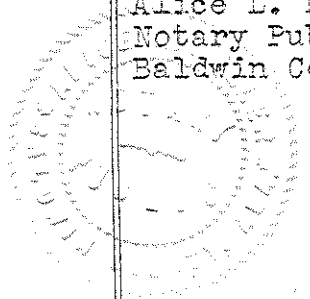
That his name is Norborne C. Stone, Jr., and that he is one of the Attorneys of record for the Plaintiff in the case of Wilmer F. Pope, individually, and doing business as Fairhope Grocery & Market vs. Al Moses, individually and doing business as Almose Restaurant, Fairhope, Alabama. That the Plaintiff secured a judgment by default on May 9, 1952, in the Circuit Court of Baldwin County, Alabama, in the amount of Three Hundred Nine and 64/100 Dollars (\$309.64) plus interest from December 31, 1951, and court costs incurred in the suit. That he is informed and believes and upon such information and belief states that the Defendant, Al Moses is about to fraudulently dispose of or remove property belonging to him and used by him in the operation of Almose Restaurant in Fairhope, Alabama, and that thereby the Plaintiff will probably lose his debt.

Dated this 10th day of May, 1952.


Norborne C. Stone, Jr.

Sworn to and subscribed before
me this the 10th day of May, 1952.


Alice L. Miller
Notary Public
Baldwin County, Alabama



RECORDED

AFFIDAVIT

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

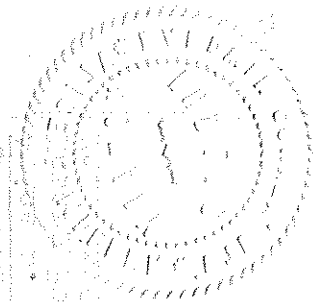
Plaintiff,

vs.

AL MOSES, individually and
doing business as ALMOSE
RESTAURANT, Fairhope, Alabama,

Defendant.

*Filed 5-10-52
Alice French
Clerk.*



[Handwritten signature]

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

Plaintiff,

vs.

AL MOSES, individually and
doing business as ALMOSE
RESTAURANT, Fairhope, Alabama,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff Wilmer F. Pope, 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 Three Hundred Nine and 64/100 Dollars (\$309.64) together with interest thereon from December 31, 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 March 20, 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 \$309.64 plus interest from December 31, 1951.

Respectfully submitted,

CHASON & STONE,

By:


Attorneys for the Plaintiff.

RECORDED

MOTION FOR JUDGMENT BY DEFAULT

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

Plaintiff,

vs.

AL MOSES, individually and
doing business as ALMOSE
RESTAURANT, Fairhope, Alabama,

Defendant.

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

FILED

MAY 8 1952

ALICE J. BUCK, Clerk