

1801

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

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

YOU ARE HEREBY COMMANDED to summon T. A. MC KENZIE 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 T. A. MC KENZIE, by the FOLEY HARDWARE COMPANY.

WITNESS my hand this the 10th day of May, 1952.

Alice J. Wrench
Clerk

* * * * *

COMPLAINT

FOLEY HARDWARE COMPANY,	Ø	IN THE CIRCUIT COURT OF
PLAINTIFF	Ø	BALDWIN COUNTY, ALABAMA
VS.	Ø	AT LAW
T. A. MC KENZIE,	Ø	
DEFENDANT	Ø	

COUNT I:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTY-FOUR & 72/100 DOLLARS (\$364.72), together with interest thereon, due from him by account on, to wit: July 7, 1949, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTY-FOUR & 72/100 DOLLARS (\$364.72), together with interest thereon, due from him on account stated between the Plaintiff and the Defendant on, to wit: July 7, 1949, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant the sum of THREE HUNDRED SIXTY-FOUR & 72/100 DOLLARS (\$364.72), together with interest thereon, due from him for merchandise, goods, and chattels sold by the Plaintiff to the Defendant on, to wit: July 7, 1949, which sum of money, with interest thereon, is still unpaid.

The Defendant lives near Fairhope, Ala.

James C. Mc...
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 6th day of May, 1952.

James C. Mc...

AFFIDAVIT OF MAX LAWRENZ

STATE OF ALABAMA, }
BALDWIN COUNTY. }

Max Lawrenz, first being duly sworn, deposes and says as follows:

My name is Max Lawrenz; I am an active partner, and part owner of the Foley Hardware Company, and as such, know that on July 15, 1949, T. A. Mc Kenzie, of Fairhope, Alabama, the Defendant, purchased from the Foley Hardware Company on July 15, 1949, one-three bottom 14inch plow, valued at \$356.59, and the sales tax was \$8.13 for a total of \$364.72. There have been no payments on this account.

Accordingly, after allowing all due credits, T. A. Mc Kenzie owes the Foley Hardware Company the sum of \$364.72, together with interest from July 15, 1949, to date.


Max Lawrenz

Sworn to and subscribed before
me, a Notary Public, this the
8th day of May, 1952.


Notary Public

Executed 6-2 1952
by serving copy of within Summons and
Complaint on

J. A. Mc Kenzie

Jay Lee Wilkins Sheriff
W. F. Hall Deputy Sheriff

FOLEY HARDWARE COMPANY,
PLAINTIFF

VS:

T. A. MC KENZIE,
DEFENDANT

COMPLAINT

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

AT LAW

FILED

MAY 10 52

ALICE L. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

FOLEY HARDWARE COMPANY,

PLAINTIFF

VS:

T. A. MC KENZIE,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,


AT LAW.

CASE NO. 1801.

MOTION

Comes the PLAINTIFF, and moves the Court to render a judgment by default in this cause in the principal amount of (\$364.72) THREE HUNDRED SIXTY-FOUR & 72/100 DOLLARS, plus SIXTY-FIVE & 64/100 DOLLARS (\$65.64) interest, for a total of FOUR HUNDRED THIRTY & 36/100 DOLLARS (\$430.36).

There was attached to the original complaint, and made a part thereof, 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 7th day of May, 1952.


Attorney for Plaintiff

1081
RECORDED

FOLEY HARDWARE COMPANY,

PLAINTIFF

VS:

T. A. MC KENZIE,

DEFENDANT

MOTION FOR JUDGMENT BY DEFAULT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 1801

FILED

JUL 9 1952

ALICE J. DUCK, Clerk