

SUMMONS

1834

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

YOU ARE HEREBY COMMANDED to summon JOHN O. PULLIAM, 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 HOME FINANCE, Foley, Alabama.

WITNESS my hand this the 21st day of July, 1952.

Alice J. Henck
Clerk

* * * * *

COMPLAINT

HOME FINANCE,	)	IN THE CIRCUIT COURT OF
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA.
	)	AT LAW.
VS:	)	
	)	
JOHN O. PULLIAM,	)	
DEFENDANT.	)	
	)	

The PLAINTIFF claims of the DEFENDANT ONE HUNDRED NINETY-ONE & 00/100 DOLLARS (\$191.00), due by promissory note made by him on the 21st day of April, 1951, and payable in eight (8) semi-monthly installments, with interest thereon.

Said note waives all exemptions under the Constitution and laws of Alabama, or any other State, as to personal property, and for a reasonable attorney's fee, which the PLAINTIFF alleges to be THIRTY & 00/100 DOLLARS (\$30.00).

James H. Chas. 11/2
Attorney for Plaintiff

AFFIDAVIT OF C. CLIFF BECK

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

I am the managing partner of Home Finance, Foley Alabama.

On April 21st, 1951, I made a loan to JOHN O. PULLIAM, the Defendant, in the amount of THREE HUNDRED SEVENTY-SEVEN & 60/100 DOLLARS (\$377.60). This was not a small loan under the statutes of Alabama, because it exceeded THREE HUNDRED (\$300.00) DOLLARS. Also, the loan was secured by a chattel mortgage on one 1948 Chevrolet 1 1/2 ton truck Dual wheels with two (2) speed rear axle and Brownlight transmission, Tandem Dual rear extra and steel bulb rack, motor number FEA 569641, which the Defendant is unable to produce after being called upon to deliver the truck securing the debt.

After allowing all just credits, JOHN O. PULLIAM owes a balance of ONE HUNDRED NINETY-ONE & 00/100 DOLLARS (\$191.00), and my Company has employed FOREST A. CHRISTIAN as our Attorney, to collect this debt.

C. Cliff Beck
C. Cliff Beck

Sworn to and subscribed before me
this the 19th day of July, 1952.

James P. Lee
Notary Public
Molony Beck

RECORDED

Served 8-5 1952
by serving copy of within Summons and
Complaint on

John O. Pulliam

Taylor Wilkins Sheriff
Edna Steadman Deputy Sheriff

HOME FINANCE

PLAINTIFF

VS:

JOHN O. PULLIAM

DEFENDANT

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED
JUL 21 1952
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA,)
BALDWIN COUNTY.)

HOME FINANCE,) IN THE CIRCUIT COURT OF
PLAINTIFF) BALDWIN COUNTY, ALABAMA.

VS:) AT LAW.

JOHN O. PULLIAM,)
DEFENDANT.)

Comes the PLAINTIFF and moves the Court to render a judgment by default, in the amount of ONE HUNDRED NINETY-ONE & 00/100 DOLLARS (\$191.00), principal, plus TWELVE & 00/100 DOLLARS (\$12.00), a crude interest.

This is a waive note.

Also, the judgment should include a reasonable attorney's fee, which the PLAINTIFF claims to be THIRTY & 00/100 DOLLARS (\$30.00).

There was attached to the original complaint, an affidavit of C. CLIFF BECK, showing the above facts.


Forest A. Christian, Attorney for
Plaintiff

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FILED
SEP 18 1952
ALICE J. BUCK, CLERK

AFFIDAVIT OF:

FOREST A. CHRISTIAN

STATE OF ALABAMA,)
BALDWIN COUNTY.)

FOREST A. CHRISTIAN, first being duly sworn, deposes and says as follows:

I am a duly liscensed practicing attorney at law, at Foley, and I have been employed to represent Home Finance in a suit on a note against JOHN O. PULLIAM.

I know the amount of fee charged by attorneys in Alabama, and I believe that \$30.00 is a reasonable attorney's fee in this matter.


Forest A. Christian

Sworn to and subscribed before me this the 1st day of September, 1952.


Notary Public

RECORDED

W 1834

HOME FINANCE,

PLAINTIFF

VS:

JOHN O. PULLIAM,

DEFENDANT

MOTION FOR JUDGMENT BY DEFAULT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

FILED

SEP 18 1952

ALICE J. BUCK, Clerk