#### SUMMONS

THE STATE OF ALABAMA, BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA: GREETING:

YOU ARE HEREBY COMMANDED to summon EDWARD E. ORENSTEIN and DOROTHY ORENSTEIN, 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 EDWARD E. ORENSTEIN and DOROTHY ORENSTEIN, by R. WALLACE MURPHY.

WITNESS my hand this the \_\_\_\_day of August, 1952.

### COMPLAINT

Ò R. WALLACE MURPHY, Ŏ IN THE CIRCUIT COURT OF PLAINTIFF BALDWIN COUNTY, ALABAMA, VS: AT LAW. EDWARD E. ORENSTEIN and DOROTHY ORENSTEIN, DEFENDANTS

The PLAINTIFF claims of the DEFENDANTS, ONE THOUSAND & 00/100 DOLLARS (\$1,000), due by promissory note made by them on the 4th day of October, 1946, and payable on the 4th day of October, 1947, with interest thereon.

Said note provides for an attorney's fee in an amount equal to five per centum of the amount of the debt and interest as counsel fees. Said note also waives all rights of exemption. The DEFENDANTS jointly and severally waive the benefit of any and all exemption laws of the state of Delaware or elsewhere.

There is attached hereto an itemized statement sworn to by the Plaintiff on August 8, 1952.

The Defendants reside at the Roberts Hotel, Robertsdald Plabama

MARYLAND
THE STATE OF XEXAWAYS, )
COUNTY OF WICOMICO )

## AFFIDAVIT OF R. WALLACE MURPHY

R. WALLACE MURPHY, first being duly sworn, deposes and says as follows:

My name is R. WALLACE MURPHY. On October 4, 1946, EDWARD E. ORENSTEIN

and DOROTHY ORENSTEIN, executed the note in my favor in the principal amount

of ONE THOUSAND & 00/100 DOLLARS (\$1,000), due and payable October 4, 1947.

No payments have been made either on the principal or on the interest. Said note also provides for the legal rate of interest together with five per centum (5%) of the amount of the debt and interest as counsel fee.

Said note also provides that the makers jointly and severally waive the benefit of any and all exemptions under the laws of the State of Delaware or elsewhere.

The said EDWARD E. ORENSTEIN and DOROTHY ORENSTEIN, owe the principal amount of ONE THOUSAND & 00/100 DOLLARS (\$1,000), plus interest at the legal rate from October 4, 1946, to date, plus other fees, and this amount is a just debt after allowing all due credit.

R. Wallace Murphy

Sworn to and subscribed before me this the Laday of August, 1952.

Noton Public

My commission expires: May 4, 1953

R. WALLACE MURPHY, PLA INTIFF IN THE CIRCUIT VS: COURT OF BALDWIN COUNTY, AT LAW. #1847 EDWARD E. ORENSTEIN AND DOROTHY ORENSTEIN, DEFENDANT.

# MOTION FOR JUDGMENT BY DEFAULT

Comes the Plaintiff and moves the Court to render judgment by default in this case.

Attorney for Plaintiff

R. WALLACE MURPHY,

PLAINTIFF

VS:

EDWARD E. ORENSTEIN & DOROTHY ORENSTEIN.

DEFENDANT

### MOTION FOR JUDGMENT BY DEFAULT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW.

ALICE J. DUCK, Register

1847

MECORDED

PLAINTIFF

VS:

EDWARD E. ORENSTEIN and DOROTHY ORENSTEIN,

R. WALLACE MURPHY,

DEFENDANTS

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

AT LAW.

FILED

AU 18 1952

ALIEF I WE'K Misth

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA

Executal Aug. 19, 1952 By Serving Copy on Edward. E., Orenstein and Dorthy Orenstein

Shereff Taylor Welkins By Edleigh Steadham