

Amco Feed Stores, Inc., a

corporation,

Plaintiff

VS.

Louis Lacey

Defendant

IN THE CIRCUIT COURT  
OF

Baldwin

~~MOBILE~~ COUNTY, ALABAMA.

AT ~~LAW~~

NO. 1897

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA {

COUNTY OF MOBILE {

NOW comes, Alice M. Meadows,

who being first duly sworn, deposes and says that the defendant herein, Louis Lacey, was not at the time of the filing of this suit, and is not now, in the Military or Naval Service of the United States.

The Defendant resides at Loxley, Alabama

SWORN to and subscribed before me,  
this the \_\_\_\_\_ day of May,  
1953.

Notary Public, ~~Mobile County, Alabama~~  
State of Alabama at Large.

Filed \_\_\_\_\_,

CLERK

AMCO FEED STORES, INC.,  
a corporation,

Plaintiff,

-vs-

LOUIS LACEY,

Defendant.

\*

\*

\*

\*

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 1897

Comes now the plaintiff in the above styled cause and shows unto this Honorable Court as follows: that on, to-wit, April 1, 1953, defendant was served with a copy of complaint and summons in this cause; that defendant has failed to plead, answer, or demur to said complaint within the time required by law; and that more than thirty days have elapsed since service was had upon the defendant.

NOW, THEREFORE, plaintiff moves this Honorable Court to enter judgment by default against the defendant and in favor of the plaintiff for the sum of Six Hundred Twenty and 47/100 (\$620.47) Dollars plus costs of court.

Howell Johnston  
ATTORNEYS FOR PLAINTIFF

FILED  
MAY 2 1953  
ALICE J. DUCK, Clerk

$$\begin{array}{r} 521,40 \\ 15 \\ \hline 260700 \\ 52140 \\ \hline 78,2100 \end{array}$$

LAW OFFICES OF  
**HOWELL AND JOHNSTON**  
FIRST NATIONAL BANK ANNEX  
P. O. BOX 1652  
MOBILE 9, ALABAMA

THOMAS O. HOWELL, JR.  
THOMAS A. JOHNSTON, III  
ALICE LOUISE MANRY  
IRVIN J. LANGFORD

May 1, 1953

Mrs. Alice J. Duck, Clerk  
Circuit Court  
Baldwin County  
Bay Minette, Alabama

Re: Amco Feed Stores  
Vs: Louis Lacey  
No: 1897

Dear Mrs. Duck:

Enclosed herewith please find motion for default judgment in the above matter, together with non-military affidavit, which we would appreciate your filing in this cause immediately.

Very sincerely yours,

HOWELL & JOHNSTON

*Alice M. Meadows*

Alice M. Meadows

AMM:ee  
Encs.

ANSWER

AMCO FEED STORES, INC., a  
Corporation,

Plaintiff,

VS.

LOUIS LACEY,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. \_\_\_\_\_

The Defendant for answer to the Complaint says that the allegations  
contained therein are untrue.

WILTERS & BRANTLEY

By:

Albert M Brantley  
Attorneys for Defendant

Defendant demands a trial by jury.

WILTERS & BRANTLEY

By:

Albert M Brantley  
Attorneys for Defendant

1897

ANSWER

AMEO FEED STORES, INC., A  
CORPORATION,

Plaintiff,

VS.

LOUIS RACEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALA BAMA.

AT LAW

CASE NO. \_\_\_\_\_

FILED  
MAY 1 1953  
ALICE J. DUCK, Clerk

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE  
STATE OF ALABAMA.

You are hereby commanded to summon Louis Lacey 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 the same, then and there to answer the complaint of Amco Feed Stores, Inc., a corporation.

Witness my hand, this 2<sup>nd</sup> day of January, 1953.

Heriberto L. Lacey  
CLERK, CIRCUIT COURT, BALDWIN COUNTY,  
ALABAMA.

AMCO FEED STORES, INC., a  
corporation,

Plaintiff,

Vs

LOUIS LACEY,

Defendant.

\* IN THE CIRCUIT COURT OF  
\* BALDWIN COUNTY, ALABAMA.  
\* AT LAW.  
\* NO. \_\_\_\_\_  
\*  
\*

COUNT ONE:

Plaintiff claims of the defendant the sum of Five Hundred Twenty-one and 40/100 (\$521.40) Dollars due by account on, to-wit, January 31, 1950, which sum of money, with the interest thereon, is still due and unpaid.

COUNT TWO:

Plaintiff claims of the defendant the sum of Five Hundred Twenty-one and 40/100 (\$521.40) Dollars due by account stated between the plaintiff and defendant on, to-wit, May 24, 1951, which sum of money, with the interest thereon, is still due and unpaid.

Howell & Johnston  
ATTORNEYS FOR PLAINTIFF

An itemized, verified statement of the account is attached hereto and forms a part hereof.

Howell & Johnston  
ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:  
Loxley, Alabama

AFFIDAVIT TO CLAIM

STATE OF Indiana

of

County of Allen

ss.

Miller B. Curless

being duly sworn, do depose and say, that he is Asst. Mgr. - Trans. of

Amco Food Stores, Inc.

; that the annexed statement of the account of

Louis Lacey

lately doing business at \_\_\_\_\_ in the State of

is just, true and correct; that there is now due Amco Food Stores, Inc.

the sum of Five Hundred twenty-one and 40/100 Dollars,

that no part thereof has been paid or satisfied, and that there are no set-offs, or counter claims thereto to the knowledge or belief of deponent.

Miller B. Curless

Subscribed and Sworn to before me this

22nd day of Oct. 19 51

Dorothy G. Harvey

My commission expires Feb. 25, 1955



Statement  
Amco Feed Stores Inc. Fort Wayne, Indiana  
Store at Robertsdale, Ala.

Louis Lacey  
Lexley, Ala.

	Balance	Charges		Credits	Balance
4-25-48	Balance				1419.99
4/27/48		14 - 18% Dairy	65.80		
		4 - C.S. Hulls	6.60		
		1 - Egg Mash	5.90		
		1 - 25 Chick starter	1.65		
		Sales Tax	1.60	81.55	1501.54
5/1/48		16 - 18% Dairy	65.80		
		4 - C. S. Hulls	6.60		
		1 - Egg Mash	5.85		
		2 - 25% Broiler	3.10		
		Sales Tax	1.63	82.98	1584.52
5/5/48		16 - 18% Dairy	75.20		
		4 - C.S. Hulls	6.60		
		2 - 25% Broiler	3.10		
		Sales Tax	1.70	86.60	1671.12
5/8/48		On Account		250.00	1421.12
5/8/48		5 - 18% Dairy	23.50		
		1 - Egg Mash	5.75		
		1 - 25% Broiler	1.55		
		2 - C.S. Hulls	3.30		
		Sales Tax	.63	34.78	1455.90
5/11/48		14 - 18% Dairy	65.80		
		4 - C.S. Hulls	6.60		
		1 - Egg Mash	5.85		
		1 - Chick Starter	6.35		
		Sales Tax	1.69	86.29	1542.19
5/15/48		14 - 18% Dairy	65.80		
		4 - C.S. Hulls	6.60		
		3 - 18% Dairy	14.10		
		Sales Tax	1.45	87.95	1630.14
5/18/48		14 - 18% Dairy	65.80		
		4 - Citrus Pulp	11.00		
		1 - Egg Mash	5.85		
		1 - Chick starter	6.40		
		Sales Tax	1.78	90.83	1720.97
5/22/48		10 - 18% Dairy	47.00		
		3 - Citrus Pulp	7.95		
		1 - Egg mash	5.85		
		Sales Tax	1.10	61.90	1782.87
5/26/48		16 - 18% Dairy	75.20		
		5 - Citrus Pulp	13.25		
		1 - Egg mash	5.85		
		1 - Chick starter	6.35		
		Sales Tax	2.01	102.66	1885.53
5/29/48		On Account		500.00	1385.53
5/31/48		14 - 18% Dairy	65.80		
		4 - Citrus Pulp	10.60		
		1 - Chick starter	6.35		
		Sales Tax	1.66	84.41	

6/4/48	14 - 18% Dairy	67.20		
	4 - Citrus Pulp	10.60		
	1 - W. Egg Mash	5.80		
	1 - Chick starter	<u>6.35</u>	89.95	
6/9/48	18 - 18% Dairy	84.60		
	5 - Citris Pulp	13.25		
	4 - 25# Grower mash	6.00		
	Sales Tax	<u>2.08</u>	105.93	
6/14/48	14 - 18% Dairy	65.80		
	4 - Citris Pulp	10.60		
	1 - Chick starter	6.35		
	1 - Egg mash	5.80		
	Sales Tax	<u>1.77</u>	90.32	
6/19/48	8 - 18% Dairy	37.60		
	2 - Citris Pulp	5.30		
	Sales Tax	<u>.86</u>	43.76	
6/22/48	16 - 18% Dairy	76.00		
	6 - Citris Pulp	15.90		
	1 - Growing mash	5.90		
	Sales Tax	<u>1.96</u>	99.76	
6/22/48	On Account		250.00	1649.66
6/28/48	14 - 18% Dairy	66.50		
	2 - Citris Pulp	5.30		
	1 - Growing mash	5.90		
	1 - Egg mash	5.80		
	Sales Tax	<u>1.67</u>	85.17	
7/3/48	14 - 18% Dairy	66.50		
	4 - Citris Pulp	10.60		
	2 - Growing mash	11.80		
	2 - Egg mash	11.60		
	Sales Tax	<u>2.01</u>	102.51	
7/8/48	14 - 18% Dairy	65.80		
	4 - Citris Pulp	10.80		
	1 - Broiler ration	6.05		
	1 - Egg mash	5.80		
	Sales Tax	<u>1.77</u>	90.22	
7/17/48	14 - 18% Dairy	65.10		
	2 - Citrus Pulp	5.40		
	1 - Egg mash	5.60		
	1 - Broiler ration	5.90		
	Sales tax	<u>1.64</u>	83.64	
7/17/48	On Account		230.05	1781.15
7/20/48	16 - 18% Dairy	73.60		
	5 - Citrus pulp	13.25		
	Sales Tax	<u>1.74</u>	88.59	1869.74
7/26/48	14 - 18% Dairy	63.00		1869.74
	4 - Citrus Pulp	10.40		
	Sales Tax	<u>1.47</u>	74.87	1944.61
7/26/48	On Account		200.00	1744.61
8/4/48	7 - 24% Dairy	32.90		
	4 - C.S. Meal	18.00		
	Sales Tax	<u>1.02</u>	51.92	1796.53
8/12/48	8 - 24% Dairy	37.20		
	5 - C.S. Meal	22.25		
	Sales Tax	<u>1.19</u>	60.64	1857.17
8/20/48	3 - 24% Dairy	13.95		
	Sales Tax	<u>.28</u>	14.23	1871.40

8/20/48  
12/24/48  
5/28/49  
6/25/49  
7/30/49  
10/28/49  
1/31/50

12/31/51

On account  
On Account  
On Account  
On Account  
On Account  
On Account  
On Account

Balance due

---	---	1000.00	871.40
---	---	225.00	646.40
---	---	25.00	621.40
---	---	25.00	596.40
---	---	25.00	571.40
---	---	25.00	546.40
---	---	25.00	521.40

521.40

INVESTING ADVISORY GROUP  
MEMBER OF THE INVESTMENT COMPANY OF AMERICA  
INCORPORATED IN NEW YORK

Investing Advisory Group  
MEMBER OF THE INVESTMENT COMPANY OF AMERICA  
INCORPORATED IN NEW YORK

*[Handwritten notes and signatures]*

*[Handwritten note]*

7/31/20  
10/58/45  
5/30/26  
9/21/21  
2/50/19  
5/51/48  
8/50/48

Received in Sheriff's Office  
this 2 day of Jan 1952  
TAYLOR WILKINS, Sheriff

Exhibited April 1 1953  
by serving copy of within Summons and  
Complaining on  
Louis Lacey

Taylor, William Sheriff  
By Steadham & Hall Deputy Sheriff

W 1897

Amco Feed Stores

16.

Louis Lacey

FILED

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