corporation,	Î IN THE CIRCUIT COURT
Plaintiff	Baldwin
Section statements are section to the section of th	XMERIKE COUNTY, ALABAMA.
Louis Lacey	NO. 1897
Befondent	
NON-MILITA	RY AFFIDAVIT
STATE OF ALABAMA (
COUNTY OF MOBILE (
NOW comes, Alice M. Meado	ws ,
who being first duly sworn, depos	ses and says that the defendant
herein, <u>Louis Lacey</u>	, was not at the time of
the filing of this suit, and is r	
val Service of the United States.	The state of the s
The Defendant resides at	T.OXIEV, ATAUAMA
	· · · · · · · · · · · · · · · · · · ·
SWORN to and subscribed before me	e ,
SWORN to and subscribed before me this the day ofMay 1953	e ,
this the day of May	e ,
this the day of <u>May</u> 1953	e,
this the day of May	e,

AMCO FEED STORES, INC., a corporation,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Plaintiff,

No. 1897 AT LAW.

-vs-

LOUIS LACEY,

Defendant.

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.

FILED MAY 2 1953

ALICE J. BUCK, Clerk

521,40 00 78,21

(3) (2)

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,

Gerlews/

HOWELL & JOHNSTON

Alice M. Meadows

AMM:ee Encs.

ANSWER

AMDO FEED STOR Corporation,	ES, INC., a	Ž Ž	•
	Plaintiff,	Ď	IN THE CIRCUIT COURT OF
V3.	,	X X	BALDWIN COUNTY, ALABAMA.
	at the	¥	A Property Andrews
LOUIS LACEY,		Q	CASE NO.
	Defendant -	Ž Ž	emmellemente para en 1900 de la califer delle califer delle califer delle califer delle califer delle califer

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

Defendant demands a trial by jury.

WILLIAMS & BRANTLEY
By: A bluer

1897

ANSWER

AMDO FEED STORES, INC., A CORPORATION,

Plaintiff,

VS.

LOUIS MACEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, AND BANA.
AT LAW

CASE NO.

MICE I DUCK, CHAN

STATE OF ALABAMA TO ANY SHERIFF OF THE BALDWIN COUNTY 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 2nd day of farman, 1953.

AMCO FEED STORES, INC., a corporation,

IN THE CIRCUIT COURT OF 22

Plaintiff,

BALDWIN COUNTY, ALABAMA. 36

30 AT LAW.

LOUIS LACEY,

٧s

2: NO.

Defendant.

4

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.

PLAINTIFF

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

DEFENDANT'S ADDRESS: Loxley, Alabama

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AFFIDAVIT TO CLAIM	
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STATE OF	
ofof	. (SS.
County of	-]
Willor R. Cur	at one
Louis Lacey	
lately doing business at	in the State of
	in the State of rect; that there is now due. Area recall to receive the state of rect.
is just, true and corr	in the State of ect; that there is now due ARRA ROOF Stores Inc

Subscribed and Sworn to before me this

thereto to the knowledge or belief of deponent.

...day of ...Oct.

My commission expires Feb. 25, 195 5

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

Louis Lacey Lowley, Ala.

Charges					
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			1.66 84.b1	Appendix.	

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/ 11. / 1.0	14 - 18% Dalry	67.20		
6/4/48	4 - Citrus Falp	10.60		
	1 - W. Igg Mash	5.80		
	1 - Chick starter	<u>_6.35</u> 89.95		
6/9/48	18 - 18% Deiry	84.60 13.25		
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· · · · · · · · · · · · · · · · · · ·	4 - Citris Pulp	10.60		*
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6/19/48	8 - 18% Dairy 2 - Citris Pulp	5.30		
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Bergina e Prioritante de la propera de la composición de la composición de la composición de la composición de la composi	Sales Tox		250.00	1649.66
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	4 - Citris Polp	10.80		
	1 - Broiler ration	6.05		
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	1 – Reg mash	5.00		
	1 - Broiler ration	5.90 <u>1.64</u> 83.64		
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8/4/48	7 - 25% Dairy	18.00		
	4 - C.S. Meal Sales Tax	1.02 51.92		1796.53
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9/ 1Z/ 40	5 - C.S. Weal	22.25		*0****
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	-	25.00	521.40

521.40

Received in Sheriff's Office this Zday of TAYLOR WILKINS, Sheriff 

W 1897 Ance Feed Stores Lanis Lacey,