INTERNATIONAL TRADE CLUB, :

IN THE CIRCUIT COURT OF

a corporation,

Plaintiff,

BALDWIN COUNTY, ALABAMA

vs.

AT LAW

EDUARDO JOHNSON,

Defendant.

CASE NO. 2849

Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY-ONE AND SEVENTY-SEVEN/HUNDREDTHS DOLLARS (\$341.77) due from him by account on, to-wit, the 25th day of June, 1969, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as "Exhibit A" and made a part hereof.

H. HAYDEN RECTOR Attorney for the Plaintiff

Defendant may be served at:

125 Confederate Drive Spanish Fort, Alabama

AUG 2 0 1969

ALICE J. DUCK RECTOR

STATE OF ALABAMA COUNTY OF MOBILE

Before me, the undersigned Notary Public, in and for said State and County, personally appeared JUDITH A. DAHLGREN, who, being by me duly sworn, deposes and says that she is the Secretary for the International Trade Club, a corporation; that the annexed statement of the account of said International Trade Club, a corporation, against EDUARDO JOHNSON is just, true and correct; that there is now due the sum of \$341.77, after deducting all credits.

JUDITH A. DAHLGREN

Subscribed and sworn to before me this / j day of August, 1969.

NOTARY PUBLIC, STATE OF ALABAMA AT LARGE

AUG 2 0 1969

ALICE J. DIGIT CLERK REGISTER

1 VOL 52 PAGE 886

P. O. Box AA ADDRESS Daphne, Alabama 36526 tav 438-3335							
		CITY					
	DATE	REFERENCE	CHARGES	CREDITS	350.99		
	:	BALANCE FORWARDE	0				
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AM 25 69

## STATE ALABAMA OFBaldwin County

Circuit Court, Baldwin County

No...8849

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA: You Are Hereby Commanded to Summon EDUARDO JOHNSON 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..... EDUARDO JOHNSON Defendant..... by \_\_\_\_\_ INTERNATIONAL TRADE CLUB, A Corporation

Witness my hand this 20th day of August

! VOL

62 PAGE 888

No. 8849 Page.		
STATE OF ALABA	MA	Defendant lives at
Baldwin County		
CIRCUIT COUR	T	Received in Office
	1117704414414141	AUG 20 19:1
INTERNATIONAL TRADE CLUE	3,	FETTH WILLIE
A Corporation,		Sher
	Plaintiffs	I have executed this summons
vs.		this UM 19
		by leaving a copy with
EDUARDO JOHNSON	Defendants	Edwardo Jahnson
SUMMONS AND COMPL	AINT	
Filed August 20,	19.69	54 miles at
Alice J. Duck	Clerk	Shelly Cigirion and the state of the state o
Alice J. Duck	Clerk	Ten Cents per mile Total \$ 5.401 TAYLOR WILKINS, Sheriff
Alice J. Duck	Clerk	Ten Cents per mile Total \$ 5,40; TAYLOR WILKINS, Sheriff Randall
Alice J. Duck	Clerk	Ten Cents per mile Total \$ 5,40
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Alice J. Duck  H. HAYDEN RECTOR	Clerk	Ten Cents per mile Total \$ 5,40; TAYLOR WILKINS, Sheriff Randall
H. HAYDEN RECTOR	Clerk	Ten Cents per mile Total \$ 5,40; TAYLOR WILKINS, Sheriff Randall
H. HAYDEN RECTOR		Ten Cents per mile Total \$ 5.401 TAYLOR WILKINS, Sheriff  BY DEPUTY SHERIFF
H. HAYDEN RECTOR	s Attorney	Ten Cents per mile Total \$ 5,401 TAYLOR WILKINS, Sheriff  BY DEPUTY SHERIFF

INTERNATIONAL TRADE CLUB, : IN THE CIRCUIT COURT OF

a corporation,

Plaintiff,

BALDWIN COUNTY, ALABAMA

vs.

AT LAW

EDUARDO JOHNSON,

Defendant.

CASE NUMBER 8849

## MOTION FOR JUDGMENT BY DEFAULT

:

:

Comes now the Plaintiff in the above styled cause and moves the Court to enter a default judgment against the Defendant in the amount of THREE HUNDRED FIFTY AND THIRTY-TWO/HUNDREDTHS DOLLARS (\$350.32), on an itemized verified statement of account attached to the bill of complaint, and assigns the following grounds:

- 1. Summons and complaint were personally served upon the Defendant August 25, 1969.
- 2. The Defendant has failed to appear, demur, plead, or answer the said summons and complaint and has wholly defaulted.
  - 3. More than thirty days has lapsed since said service.

Attorney for the Plaintiff

Amount of account

\$341.77

Interest

\$ 8.55

Total judgment

\$350.32



NOV 19 1969

INTERNATIONAL TRADE CLUB	IN THE CIRCUIT COURT
a corporation,	_ of
Complainant.	BALDWIN XIORIX COUNTY, ALABAMA.
VS.	}
EDUARDO JOHNSON	NO. 8849
The state of the s	·
Defendant.	-]
NON-MILITAE	RY AFFIDAVIT
STATE OF ALABAMA COUNTY OF MOBILE	
NOW comes, H. Hayden Rector	
who being first duly sworn, deposes and says the Eduardo Johnson	hat the defendant herein,
was not at the time of the filing of this suit, as	nd is not now in the Military or Naval Service of
the United States.	
The Defendant resides at125 Confe	derate Drive, Spanish Fort, Alabama
	HOGALUKEOLOS  H. HAYDEN RECTOR
Sworn to and subscribed before me,	
this 17th day of November	•••···································
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NOTARY PUBLIC, MANKEX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
FILED	
REGISTER	····

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## NON-MILITARY AFFIDAVIT