

----- :  
CRANE COMPANY, a corporation, :  
 : Case No. 2101  
Plaintiff, :  
 : IN THE CIRCUIT COURT OF  
-vs- : BALDWIN COUNTY, ALABAMA.  
 :  
 : AT LAW.  
C. S. TRAWICK, et als., :  
doing business as partners :  
under the firm name and style :  
of C. S. TRAWICK & SON, :  
 :  
Defendants. :  
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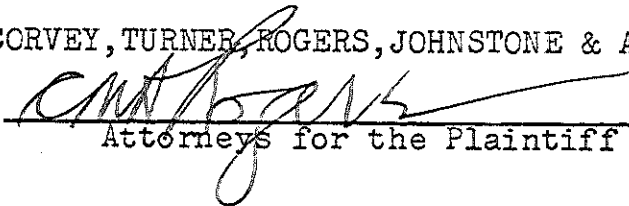
Comes the plaintiff, Crane Company, a corporation, acting by and through its attorneys at law and respectfully shows unto the Court that on, to-wit, October 7th, 1953, service of a summons and complaint was made on C. S. Trawick, Eugene Trawick, Harvey Trawick and Jasper (Jack) Trawick, doing business as partners under the firm name and style of C. S. Trawick & Son, and that the defendants were advised that they should appear within thirty days from service of process in the Circuit Court of Baldwin County, Alabama, at the place of holding the same then and there to answer the complaint of Crane Company, a corporation, and movants further show that C. S. Trawick, Eugene Trawick, Harvey Trawick and Jasper (Jack) Trawick have not appeared nor have any of them appeared and none of them has made answer in accordance with the process served upon them.

WHEREFORE, Crane Company, a corporation, respectfully submits as proof of its complaint its itemized sworn statement of account attached to its complaint, and respectfully moves and requests that a judgment by default be made and entered in this action against the defendants in this action for the sum of \$1,067.51, together with interest at the rate of six per cent per annum on said sum of \$1,067.51 to the date of judgment, Tuesday, November 24th, 1953, interest being in the amount of \$94.96, and the total amount of the judgment to be entered being \$1,162.47.

In this connection, movants show that there is attached to the complaint an itemized, verified statement of the account of the claim made the basis of this action which the defendants, within the time allowed them for pleading, have never denied in the manner directed by Section 378, Title 7 of the Code of Alabama of 1940, so that the verified account is competent evidence of the correctness of the account in accordance with law.

McCORMEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By

  
Attorneys for the Plaintiff

2101

FILED  
NOV 23 1907  
ALICE J. COCK, Clerk

RECEIVED  
NOV 23 1907  
ALICE J. COCK, Clerk

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS  
ATTORNEYS AT LAW

NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING

TELEPHONE 3-6556 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. McCORVEY  
BEN D. TURNER  
C. M. A. ROGERS  
C. A. L. JOHNSTONE, JR.  
R. F. ADAMS  
JAMES L. MAY, JR.  
CHAUNCEY MOORE  
ALEX T. HOWARD, JR.

September 29th, 1953.

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

Dear Mrs. Duck:      Re: Crane Company vs. C. S. Trawick & Son

Enclosed herewith please find the original complaint and four copies of the complaint which you will please file in the Circuit Court and see that summons is issued commanding the several defendants to come into Court.

With kindest personal regards, I am

Sincerely yours,



R/J  
Encl.

No. 2101

Crane Co

vs.

C. S. Francis  
et al

Filed 10-1-53

McCormey et al

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. S. Trawick, Eugene Trawick, and Jasper

(Jack) Trawick d/b/a C. S. Trawick & Sons.

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 \_\_\_\_\_

C. S. Trawick & Sons, Defendant

by \_\_\_\_\_

Crane Company, a corporation, Plaintiff

Witness my hand this 1st day of October 1953

Dee J. Duck, Clerk

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY  
**CIRCUIT COURT**

Crane Company, a corporation

Plaintiffs

vs.

G. S. Trawick Eugene Trawick

and Jasper (Jack) Trawick  
d/b/a/ G. S. Trawick & Son

Defendants

**SUMMONS and COMPLAINT**

Filed 9-30-53, 19\_\_

*W. J. ...* Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at \_\_\_\_\_

RECEIVED IN OFFICE

\_\_\_\_\_, 19\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_  
by leaving a copy with \_\_\_\_\_

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

-----:  
CRANE COMPANY, a corporation, :

Plaintiff, :

-vs- :

C. S. TRAWICK, EUGENE TRAWICK,  
HARVEY TRAWICK and JASPER  
(JACK) TRAWICK, doing business  
as partners under the firm name  
and style of C. S. TRAWICK & SON, :

Defendants. :  
-----

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

1. The plaintiff claims of the defendants the sum of \$1,067.51 due from them by account on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

2. The plaintiff claims of the defendants the further sum of \$1,067.51 on account stated between the plaintiff and defendant on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

3. The plaintiff claims of the defendants the further sum of \$1,067.51 for merchandise, goods and chattels sold by the plaintiff to the defendants on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By                     

Attorneys for the Plaintiff.

There is attached hereto an itemized, verified statement of the account of the claim made the basis of this action.

NOTE: The defendants reside in Foley, Baldwin County, Alabama.



JAMES E. MOORE  
ATTORNEY AT LAW  
608 VAN ANTWERP BUILDING  
MOBILE 12, ALABAMA  
TELEPHONE 3-9526

June 3, 1953

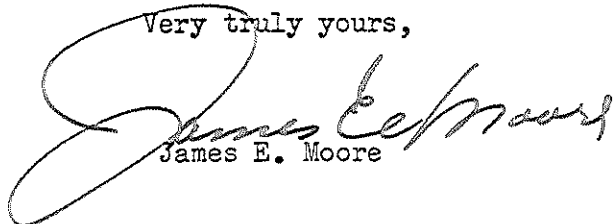
Mrs. Alice J. Duck  
Clerk, Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

I have your card informing me that the summons in case #19921, Guy E. Brooks -vs- Orlow P. Brooks, et al, was returned by the Sheriff "not found". However, I am assured that the Defendants' attorneys will accept service in this case, since this is an appeal out of the Probate Court of Baldwin County in which the same attorney, Mr. J.B. Blackburn, represented the Defendants. I think if you will send the summons and complaint to their office they will accept service on behalf of the Defendants.

If however you have any difficulty in this respect, I will appreciate your informing me.

Very truly yours,

  
James E. Moore

JEM/eg

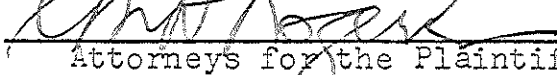
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CRANE COMPANY, a corporation,	:	
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Plaintiff,	:	IN THE CIRCUIT COURT OF
	:	BALDWIN COUNTY, ALABAMA.
-vs-	:	
	:	AT LAW.
C. S. TRAWICK, EUGENE TRAWICK,	:	
HARVEY TRAWICK and JASPER	:	
(JACK) TRAWICK, doing business	:	
as partners under the firm name	:	
and style of C. S. TRAWICK & SON,	:	
	:	
Defendants.	:	
-----	:	

1. The plaintiff claims of the defendants the sum of \$1,067.51 due from them by account on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

2. The plaintiff claims of the defendants the further sum of \$1,067.51 on account stated between the plaintiff and defendant on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

3. The plaintiff claims of the defendants the further sum of \$1,067.51 for merchandise, goods and chattels sold by the plaintiff to the defendants on, to-wit, the first day of June, 1952, which sum of money, with the interest thereon, is still unpaid.

McCORMEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By   
Attorneys for the Plaintiff.

There is attached hereto an itemized, verified statement of the account of the claim made the basis of this action.

NOTE: The defendants reside in Foley, Baldwin County, Alabama.

State of ALABAMA

SS.

County of MOBILE

Personally appeared before me, the undersigned attesting officer, duly authorized to administer oaths in the State and County aforesaid, Clyde Arnold, who being duly sworn, deposes and says that he is Credit Manager of Crane Co., Mobile, Ala.

and is authorized

to make this affidavit, that the attached statement of account is true; that the debt is just; the sum of

One Thousand Sixty-Seven and 51/100

Dollars

is due and owing by C. S. Trawick & Sons, Foley, Alabama

to said Crane Co.

and remains unpaid, and that there are no just discounts, off-sets, credits or counter claims against said demand, either in law or equity; and that said sum is now due, exclusive of any payment, set-off or usurious interest, and that lawful interest is due thereon.

Sworn to and subscribed before me, this

24 day of Sept 1953

H. L. Burgin Jr.  
Notary Public County Fulton

Clyde Arnold

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. S. Trawick, Eugene Trawick, and Jasper

(Jack) Trawick d/b/a C. S. Trawick & Sons.

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 \_\_\_\_\_

C. S. Trawick & Sons, Defendant.---

by \_\_\_\_\_

Crane Company, a corporation Plaintiff.---

Witness my hand this 1st day of October 1953.

Alice J. Smith, Clerk

RECORDED

No. 2101

Page \_\_\_\_\_

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Crane Company, a corporation

Plaintiffs

vs.

G. S. Trawick, Eugene Trawick

and Jasper (Jack) Trawick

d/b/a/ C. S. Trawick & Sons Defendants

SUMMONS and COMPLAINT

Filed

9-30-53

, 19

W. J. L. L. L., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Oct 1, 1953

, Sheriff

I have executed this summons

this

, 19

by leaving a copy with

C. S. Trawick 10-7-53

Eugene Trawick 10-7-53

Not found as to  
Jasper "Jack" Trawick  
in California

Taylor W. L. L. Sheriff  
Edling S. L. L. Deputy Sheriff

MCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

ATTORNEYS AT LAW

NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING

TELEPHONE 3-6556 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. MCGORVEY  
BEN D. TURNER  
C. M. A. ROGERS  
C. A. L. JOHNSTONE, JR.  
R. F. ADAMS  
JAMES L. MAY, JR.  
CHAUNCEY MOORE  
ALEX T. HOWARD, JR.

June 13, 1955

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

Dear Mrs. Duck:

Enclosed herewith please find the check of Mr. Arthur C. Epperson, attorney for C. S. Trawick & Son, in the sum of \$15.00 in payment of the costs in the matter of the judgment obtained by Crane Company against C. S. Trawick, Eugene Trawick, Harvey Trawick and Jasper Trawick, doing business as partners under the firm name and style of C. S. Trawick & Son.

In your letter of May 30th you advised me that a letter informing you that the judgment had been satisfied is sufficient to cancel the judgment in your Court. I am sending you two copies of this letter and if this letter will serve as a cancellation of the judgment I shall appreciate it if you will note that fact on the docket of your Court.

I appreciate the courtesies you show us.

Sincerely yours,



R/f

cc: Arthur C. Epperson, Esq  
Foley, Alabama

2101

Crane Co.

U.S.

C.S. Grawick & Sons

1912

FOUNDED BY R. T. CRANE 1855  
**CRANE CO.**

2 So. Twentieth St.  
BIRMINGHAM 3, ALA.

TERMS: NET 30 DAYS,  
OR 2%, 10<sup>TH</sup> PROX.,  
UNLESS  
OTHERWISE SPECIFIED

C. S. TRAWICK & SON  
FOLEY, ALABAMA


SEP 24 1953

ANALYSIS OF FINAL BALANCE

APR. \_\_\_\_\_ JULY \_\_\_\_\_ OCT. \_\_\_\_\_

MAY \_\_\_\_\_ AUG. \_\_\_\_\_ NOV. \_\_\_\_\_

JUNE \_\_\_\_\_ SEPT. \_\_\_\_\_ DEC. \_\_\_\_\_

	CHARGES	CREDITS	BALANCE
	BALANCE BROUGHT FORWARD		
1952	407.07		
1952	513.08		
1952	145.81		
1952	1.55		1,067.51
CERTIFY THIS IS A TRUE AND CORRECT STATEMENT AND IS UNPAID.			
CRANE CO.			
			
Clyde Arnold			
Credit Supervisor			



ILL  
ED  
IE  
;

FOUNDED BY R. T. CRANE 1855

# CRANE CO.

2 So. Twentieth St.  
BIRMINGHAM 3, ALA.

TERMS: NET 30 DAYS  
OR 2% 10TH PROX.  
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C. S. TRAWICK & SON  
POLEY, ALABAMA

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CRANE CO.			
			
Clyde Arnold			
Credit Supervisor			