

G. C. COGGIN,	)	IN THE CIRCUIT COURT
	)	
Plaintiff,	)	OF BALDWIN COUNTY,
	)	
vs	)	ALABAMA,
	)	
WAYNE A. MIDDLETON,	)	CIVIL DIVISION
	)	
Defendant.	)	NO. 8983

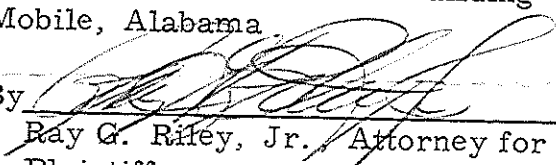
COMPLAINT

The plaintiff claims of the defendant the sum of Five Hundred and No/100 Dollars (\$500.00) as punitive and compensatory damages for that on, to wit: The 3rd day of September, 1969, the defendant made and delivered to the plaintiff his check in writing, dated on that date, drawn on The First National Bank of Fairhope, Fairhope, Alabama, payable to cash in the amount of Seventy-five and No/100 Dollars (\$75.00); and

Although said check was duly presented for payment it was not paid and due notice of its dishonor was given to defendant who continues to fail and refuses to pay the amount represented thereby.

Plaintiff further avers that he claims of the defendant a reasonable attorney's fee for the collection of said check, which attorney's fee is claimed in the amount of One Hundred Fifty and No/100 Dollars (\$150.00) which sum plaintiff alleges is reasonable and which is claimed in addition to the other amounts claimed herein.

TONSMEIRE & McFADDEN  
2210 First National Bank Building  
Mobile, Alabama

By   
Ray G. Riley, Jr. Attorney for  
Plaintiff

Defendant's Address for Service:

Route 1  
Loxley, Alabama

**FILED**

NOV 12 1969

**ALICE J. DUCK** CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

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 Wayne A. Middleton

.....  
.....  
.....

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.....

Wayne A. Middleton....., Defendant.....

by G. C. Coggin.....

....., Plaintiff.....

Witness my hand this 12th day of November, 1969.

Alice J. Luck, Clerk

24/  
11-20-69

80

No. 8983

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

G. C. COGGIN

Plaintiffs

vs.

WAYNE A. MIDDLETON

Defendants

SUMMONS AND COMPLAINT

Filed November 12, 1969

Alice J. Duck

Clerk

Tonsmeire & McFadden

By: Ray G. Riley, Jr. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received in Office

NOV 12 1969

19.....

~~WAYNE A. MIDDLETON~~

Sheriff

I have executed this summons

this 20 NOV. 1969

by leaving a copy with

Wayne A. Middleton

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY

L. P. Brown  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

L. P. Brown Deputy Sheriff

40 miles N.T.

G. C. COGGIN, : IN THE CIRCUIT COURT OF  
Plaintiff : BALDWIN COUNTY,  
v. : ALABAMA  
WAYNE A. MIDDLETON, : AT LAW  
Defendant. : CASE NO. 8983

PETITION FOR JUDGMENT BY DEFAULT

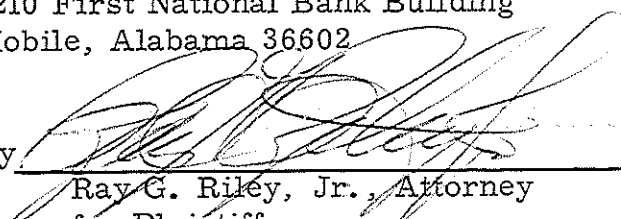
Comes now the plaintiff in the above matter and respectfully represents and shows unto Your Honor as follows:

1. That heretofore and on, to-wit, the 11th day of November, 1969, your plaintiff filed a complaint in the above-styled cause.
2. That heretofore and on, to-wit, the 20th day of November, 1969, the defendant was personally served with summons and copy of plaintiff's complaint.
3. That subsequent to such date, defendant has failed to make an appearance and has not demurred, pleaded or answered to the complaint in this cause, although more than thirty (30) days has expired, such failure to file pleadings being contrary to the rules and practices of this Honorable Court and the statutes and laws of the State of Alabama.

WHEREFORE, the premises considered, plaintiff respectfully prays that a judgment by default be entered in favor of the plaintiff and against the defendant, Wayne A. Middleton, in the amount sued for.

TONSMEIRE & McFADDEN  
2210 First National Bank Building  
Mobile, Alabama 36602

By

  
Ray G. Riley, Jr., Attorney  
for Plaintiff

STATE OF ALABAMA )

COUNTY OF MOBILE )

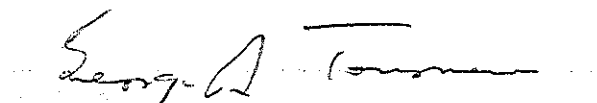
AFFIDAVIT THAT DEFENDANT  
IS NOT IN MILITARY SERVICE OF U. S.

Before me, the undersigned, a Notary Public in and for said  
State and County, personally appeared G. C. Coggin, who is known  
to me and who by me being first duly sworn doth depose and say:

That he is the plaintiff in the case of G. C. Coggin v. Wayne A.  
Middleton, which is now pending for trial in the Circuit Court of  
Baldwin County, Alabama; that Wayne A. Middleton, who is the de-  
fendant in the above-styled cause, and who is in default of any  
appearance, and who has not demurred, pleaded or answered to the  
complaint in this cause, is not at this time a person in the military  
service of the United States or in any branch of said service, but is  
presently domiciled at Route 1, Loxley, Alabama.

  
G. C. Coggin

Subscribed and sworn to  
before me on this 19 day of January,  
1970.

  
Notary Public, Mobile County, Ala.

FILED

JAN 24 1970

ALICE J. BUSH CLERK  
REGISTER

RETURNED UNPAID FOR  
REASON INDICATED:

- ☐ INSUFFICIENT  
FUNDS  
☐ ENDORSEMENT  
☐ MISSING  
☐ NOT AS DRAWN  
☐ WRONG BANK  
☐ SIGNATURE  
☐ UNCOLLECTED  
FUNDS  
☐ OTHER REASON  
(SPECIFY)

ABA APPROVED  
BY BANK SERVICE ALLEGAN, MICH. 5-13

WAYNE MIDDLETON

ROUTE 1  
ALABAMA 36551

274

61-461  
651

Sept. 3 19 69

\$ 75.00

DOLLARS

BANK OF FAIRHOPE  
tsdale, Spanish Fort

Wayne Middleton

0651 0461 43 038 18

0000007500

RETURNED BY  
First National Bank of Fairhope, Fairhope, Alabama

FOI

MR. OR MRS. WAYNE MIDDLETON  
ROUTE 1  
LOXLEY, ALABAMA 36551

274

61-461  
651

Sept. 3 19 69

PAY  
TO THE  
ORDER OF

Cash  
Seventy five and 00/100

\$ 75.00

SEP 11 1969

FIRST NATIONAL BANK OF FAIRHOPE  
Fairhope, Daphne, Robertsedale, Spanish Fort  
Alabama

DOLLARS

FOR Wood-rock

Wayne Middleton

06510461

43 038 18

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61-26

SEP 9 5 56 PM '64

**SECRET**

~~CONFIDENTIAL~~

**FOOT LOCKER INC.**

69556

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