

FOLEY IMPLEMENT COMPANY, INC.,	)	
a corporation, Foley, Alabama,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
	)	
vs.	)	AT LAW
	)	
RAYMOND EICHER,	)	CASE NO. 9590
	)	
Defendant.	)	

MOTION FOR DEFAULT JUDGMENT

Comes the Plaintiff in the above styled cause and files this its motion for default judgment for the amount sued for against the Defendant on the grounds that more than thirty (30) days have elapsed since service of the summons and complaint upon said Defendant and that said summons was duly served according to law and that said Defendant has failed to answer, plead, or demur to the Complaint in this cause.

  
 Attorney for Plaintiff

**FILED**

MAR 1 1971

EUNICE B. BLACKMON CIRCUIT CLERK

STATE OF ALABAMA)  
BALDWIN COUNTY) . . . . . IN THE CIRCUIT COURT . . . LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Raymond Eicher to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Foley Implement Company, Inc.

WITNESS my hand this the 5 day of Dec., 1970.

Alice J. Duck  
Clerk

\* \* \* \* \*

FOLEY IMPLEMENT COMPANY, INC.,	)	IN THE CIRCUIT COURT OF
a corporation, Foley, Alabama,	)	
	)	BALDWIN COUNTY, ALABAMA
Plaintiff,	)	
	)	AT LAW
vs.	)	
	)	
RAYMOND EICHER,	)	CASE NO. <u>9590</u>
	)	
Defendant.	)	

COUNT I

The Plaintiff, Foley Implement Company, Inc., a corporation, claims of the Defendant, RAYMOND EICHER, \$521.50, and the interest thereon from January 1, 1969, for merchandise sold and services rendered to the said Raymond Eicher, on to-wit, between FEBRUARY 1968, and January, 1969, at his request, and which sum is due and unpaid. An itemized statement of account, verified by affidavit, is attached hereto pursuant to Section 378 of Title 7 of the Code of Alabama of 1940, Recompiled 1958.

Thomas W. Hubbard, Jr.  
Attorney for Plaintiff

Defendant may be served at:  
619 Pedigo Street  
Foley, Alabama

FILED

DEC 7 1970

C. G. C.

ALICE J. DUCK

CLERK  
REGISTER

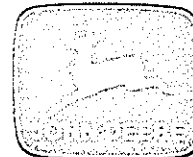
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FOLEY IMPLEMENT COMPANY, INC.

P. O. Box 429

Foley, Alabama 36535 - Ph. 943-5550



# John Deere Agricultural Equipment

## Summary by month of account of Raymond Eicher

	CHARGES		CREDITS	BALANCE OF ACCOUNT
February, 1968	Parts \$ 103.51 Workorder 27.82			\$ 131.33
March, 1968	Parts 75.78			207.11
April, 1968	Workorder 84.51			291.62
May, 1968	Parts 18.10			309.72
June, 1968	Parts 92.15	Paid \$ 100.00		301.87
July, 1968	Workorder 215.37			517.24
August, 1968	Parts 6.92			524.16
September, 1968	Parts 64.9			530.65
October, 1968	Workorder 187.08	Paid 100.00		617.73
November, 1968	Parts 3.77			621.50
January, 1969		Paid 100.00		521.50

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, Virginia Dodd, a Notary Public in and for said County in said State, personally appeared John M Schaff, who is known to me, and who, after being by me first duly and legally sworn, deposes and says that he is President of Foley Implement Company, Inc., a corporation, and as such is familiar with the accounts of said corporation; that the foregoing statement of account of said firm against Raymond Eicher is just, true and correct, and that there is now due on said account to Foley Implement Company, Inc., the sum of \$521.50, plus accrued interest thereon, after deducting all just credits, off-sets or counter claims.

Sworn to and subscribed before me on this  
4th day of December, 1970.

Virginia Dodd  
Notary Public, Baldwin County  
State of Alabama

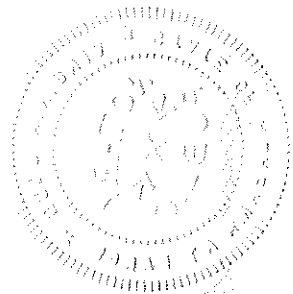
at Large

John M. Schaff

9590

Staley Implement Co.  
vs. a corp. Staley

vs.  
Raymond Eicker



Received 7 day of Dec. 1910  
and on 28 day of Jan 1911  
I served a copy of the within SAC  
on Raymond Eicker

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Raymond Eicker D. S.

Sheriff claims 91 miles at  
Ten Cents per mile Total \$ 9.10  
TAYLOR WILKINS, Sheriff  
By Chas. E. Underwood  
DEPUTY SHERIFF

Thomas Underwood, Jr.