

ROYSTER COMPANY, a corpora-)
tion,)
)
Plaintiff,)
)
vs.)
)
KERMIT FLOWERS,)
)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 9744

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

JUN 3 1971

UNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public in and for said County and State, personally appeared Marilyn A. Wilsey who, after being by me first duly and legally sworn, deposes and says under oath as follows: That her name is Marilyn A. Wilsey that she is the bookkeeper for ROYSTER COMPANY, Fertilizers and Agricultural Chemicals, P. O. Box K-Foley, Alabama, and that as such bookkeeper is familiar with the books and records of said Company; that she has personal knowledge of the correctness of the account of KERMIT FLOWERS, and that there is due from ~~KERMIT~~ FLOWERS the sum of \$789.20 as above set out, after allowing all just credits and offsets.

Marilyn A. Wilsey

Sworn to and subscribed before me on this
10th day of March, 1971.

James L. Childress
Notary Public, Baldwin County
State of Alabama

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Hermit Flowers

Foley, Ala.

Credit Limit

Credit Limit		DATE		ITEMS		Folio	✓	DEBITS	✓	CREDITS	DR OR CR.	BALANCE
18-453 ENTRANCE HAMMERMILL LEDGER		19. 10. 9										
3	17	Inv.	7897 ✓	Bon.	5-10-15	4.00 Tons		20820				20820
3	17	Inv.	7898 ✓	Bon.	5-10-15	2.20 Tons		10901				31721
3	17	Inv.	7903 ✓	Bon.	5-10-15	2.00 Tons		10110				41831
3	17	Inv.	7909 ✓	Bon.	5-10-15	6.00 Tons		30330				72161
3	27	Inv.	7916 ✓	Bon.	5-10-15	4.00 Tons		20220				92381
3	27	Inv.	7917 ✓	(Credit) Bon.	5-10-15	4.00 Tons		(20820)				71561
3	29	Inv.	7930 ✓	Bon.	5-10-15	100#P 2.00 Tons		10110				81671
3	29	Inv.	7939 ✓	Bon.	8-8-8	2.29 Tons		11370				93041
3	29	CR	5096	Check	\$80.00					8000		85041
4	3	Inv.	7940 ✓	Bon.	6-12-12 (100#P)	2.00 Tons		10140				95181
4	28	CR	4213	Check	\$85.60					8560		86621
5	5	Inv.	8137 ✓	Arrow	15-0-15	4.40 Tons		25960				112581
5	5	Inv.	8140 ✓	Arrow	15-0-15	.20 Tons Bon. 8-8-8 .05 Tons		1433				114014
5	5	CR	4218 ✓	Check	\$120.00					12000		102014
5	12	Inv.	8168 ✓	Bon.	4-8-16	4.04 Tons		18826				120840
6	9	Inv.	8196 ✓	Limestone Blk. Drd.	13.53			12177				133017
8	19	CR	4290 4267 ✓	Sales Adj.						4523		128494
10	2	CR	4290 ✓	Check	\$95.00					9500		118994
10	9	CR	4296 ✓	Check	\$401.60					40160		78834
12	31	Inv.	3904 ✓	Service Chg.				788				79622
2	4	Inv.	3940 ✓	Service Chg.				796				80418
2	28	Inv.	4300 ✓	Service Chg.				804				81222
3	31	Inv.	4413 ✓	Service Chg.				812				82034
4	30	Inv.	5300 ✓	Service Chg.				820				82854
5	30	Inv.	5372 ✓	Service Chg.				828				83682
6	30	Inv.	5433 ✓	Service Chg.				836				84518
7	31	Inv.	5513 ✓	Service Chg.				845				85363
8	31	Inv.	5513 ✓	Service Chg.				845				86208

ADDRESS

Sheet No.

Wm. Magee

Hermit Flowers	Box 943-7921	Terms
Foley, Ala.	Box 943-6493 (?)	Rating
		Credit

Terms

Rating

Credit Limit

[illegible]

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 KERMIT FLOWERS 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 ROYSTER COMPANY, a corporation,

WITNESS my hand this 11 day of March, 1971.

Eunice B. Blackmon
Clerk

* * * * *

COMPLAINT

ROYSTER COMPANY, a corporation,

Plaintiff,

vs.

KERMIT FLOWERS,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9744

The Plaintiff claims of the Defendant Seven Hundred Eighty-nine and 20/100 Dollars (\$789.20) due from him by account on, to-wit, February, 1971, which sum of money is still unpaid.

An itemized statement of account, verified by affidavit, is attached hereto pursuant to Section 378 of Title 7 of the Code of Alabama 1940, Recompiled 1958.

Thomas W. Underwood Jr.
Attorney for Plaintiff

Defendant may be served at:

Foley, Alabama

FILED

MAR 11 1971

EUNICE B. BLACKMON CIRCUIT CLERK

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FILED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

ROYSTER COMPANY, a corpora-
tion,
Plaintiff

-VS-

KERMIT FLOWERS,
Defendant

SUMMONS AND COMPLAINT

FILED

MAR 11 1971

EUNICE B. BLACKMON
CLERK

Sheriff claims 172 miles at
Ten Cents per mile Total \$ 17.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

Received 11 day of March 1971
and on 14 day of April 1971
I served a copy of the within S&C
on Kermit Flowers

By service on _____
TAYLOR WILKINS, Sheriff
BY [Signature] D. S.