ALDEN'S	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff	)	BALDWIN COUNTY, ALABAMA
	)	
VS	)	AT LAW
	)	
THOMAS N. SEAY	)	
	)	
Defendant	)	case no. <u>/0,37</u> /

Plaintiff claims of the defendant TWO HUNDRED FORTY-FOUR and 48/100 (\$244.48) DOLLARS due from him by account on October, 1969, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

WILLIAM L. HOWELL Attorney for Plaintiff

Serve the defendant at:

366 Wisteria St. Fairhope, Ala.

FILED

MAY 1 1972

EUNICE B. BLACKMON CIRCUIT



4/6/72 dr

Doctors & Merchants Service Bureau 160 Congress St B 167 Mobile AL 36601

I hereby affirm and certify that the statement shown below is a correct and true statement of the monthly payment account of Thomas N Seay 366 Wisteria St Fairhope AL 36532

DATE	PAYMENTS	CREDITS	PURCHASES	SER. CEG.	BAL.
10/69		1.00	245.67		
11/69 12/69				4 - 36	
1/70			4.78	4•41 4•50	
2/70			,	4.65	
3/70	10.00			4.73	
<sub>1</sub> /70	22.00	•		4.64	
5/70	20.00			4 • 35	
5/70	10.00	**		4.10	
7/70				4.00	
3/70	15.00			4.14	
9/70 10/70				3.96	
11/70	11.00			1.07	
12/70	4.4. ⊕ ∜.0			4.25	
1/71				կ.13 կ.20	
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State of Illinois County of Cook

Subscribed and sworn to before me this day 1770

Notary Public

June 7, 1972

TP: VS 23/08 My Commission Expires

 $\mathcal{M}_{n}$ 

ALDENS, INC.

Local Collection Manager

Emp	loyment_	Dairy Fresh Corp.		366 Wisteria ( Mobile, Alah	
		D			
		Professional Servi Merchandise, Goods, Date of Last Charge	Sold and Del		
		Date of Last Paymen			10-69

NOTARY PUBLIC

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

Affiant

Sworn and subscribed to before me this 25 day of 4 1972

My commission expires:

STATE OF ALABAMA	Circ	zuit Court, Baldwin County
Baldwin County	No. 10,370	••••••
		TERM, 19
	TO ANY SHERIFF OF	THE STATE OF ALABAMA:
You Are Hereby Commanded to S	ummon Thomas N. Seay	
	and the second of the second o	
to appear and plead, answer or de filed in the Circuit Court of Baldw	The production of the second s	ne service hereof, to the complaint
Thomas N. Seay		
by Alden's		
		Plaintiff
witness my hand this. 1st		1972
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				ALABAMA COUNTY				
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Plaintiff's Attorney

Defendant's Attorney

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Defendant lives at

WILLIAM L. HOWELL

Attorney at Law

SUITE 2204 FIRST NATIONAL BANK BLOG. MOBILE, ALABAMA 36602 December 18, 1972

TELEPHONE

AREA CODE 205

438-2516

Ms. Eunice B. Blackmon Clerk of Circuit Court Baldwin County Courthouse Bay Minette, Alabama

Re: Alden's vs Thomas N. Seay, Case No. 10,370

Dear Ms. Blackmon:

Please issue an alias execution against the defendant. Also, please forward the enclosed letter to the Sheriff requesting a levy.

Thanking you in advance for your cooperation, I am,

Very truly yours,

William L. Howell

WLH:gd

ALDEN'S	) IN THE CIRCUIT COURT (	ϽF
Plaintiff	) BALDWIN COUNTY, ALABAI	ΑM
VS	) AT LAW	
THOMAS N. SEAY	)	
Defendant	) CASE NO. 10,370	

### MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and shows and represents unto Your Honor that the defendant in the above styled cause was served with process on May 4, 1972 and since that date has failed and refused to plea, answer, or demur to the complaint, and still fails and refuses to plea, answer or demur;

WHEREFORE, the plaintiff moves Your Honor to make and enter a judgment for the plaintiff in the sum of TWO HUNDRED EIGHTY-THREE and 60/100 (\$283.60) DOLLARS.

> musin WILLIAM L. HOWELL

Attorney for Plaintiff Suite 2204 First National Bank

Mobile, Alabama 36602

#### WILLIAM L. HOWELL

Attorney at Law

SUITE 2204 FIRST NATIONAL BANK BLDG. MOBILE, ALABAMA 36602

June 7, 1972

TELEPHONE

AREA CODE 205

438-2516

Mrs. Eunice B. Blackmon Clerk of Circuit Court Baldwin County Court House Bay Minette, Alabama

Re: Alden's vs Thomas N. Seay, Case # 10,370

Dear Mrs. Blackmon:

Please forward the attached Motion for Judgment by Default in the above styled matter, along with the letter to His Honor with a breakdown of the computation.

Thanking you for your cooperation in the matter, and with warmest regards, I am,

Very truly yours,

William L. Howell

WIH:qd

Encl:

## WILLIAM L. HOWELL Attorney at Law

SUITE 2204 FIRST NATIONAL BANK BLDG. MOBILE, ALABAMA 36602 June 7, 1972

TELEPHONE

AREA CODE 205
438-2516

Honorable Telfair Mashburn Judge of Circuit Court Baldwin County Court House Bay Minette, Alabama

Re: Alden's vs Thomas N. Seay, Case # 10,370

Dear Judge Mashburn:

Please enter a default judgment in the above styled matter in the sum of \$283.60. A Breakdown of the computation of the judgment is as follows:

Principal	•	-	•	•	•		•	.\$244.48
Interest	•	•		•	-	•	•	39.12
Total								\$283.60

Thanking you for your considerations in the matter, and with warmest regards, I am,

Very truly yours,

William L. Howell

WLH:qd

ALDEN'S	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs	) }	AT LAW
THOMAS N. SEAY	)	
Defendant	)	CASE NO. 10,370

#### MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and shows and represents unto Your Honor that the defendant in the above styled cause was served with process on May 4, 1972 and since that date has failed and refused to plea, answer, or demur to the complaint, and still fails and refuses to plea, answer or demur;

WHEREFORE, the plaintiff moves Your Honor to make and enter a judgment for the plaintiff in the sum of TWO HUNDRED EIGHTY-THREE and 60/100 (\$283.60) DOLLARS.

WILLIAM L. HOWELL

Attorney for Plaintiff Suite 2204 First National Bank Mobile, Alabama 36602

# WILLIAM L. HOWELL Attorney at Law

SUITE 2204 FIRST NATIONAL BANK BLDG. MOBILE, ALABAMA 36602 April 26, 1972

TELEPHONE
AREA CODE 205
438-2516

Clerk of Circuit Court Baldwin County Court House Bay Minette, Alabama

Re: Alden's vs Thomas N. Seay

Dear Sir:

10,370

Please advise me at your earliest convenience as to the case number and the date of service of process on the above defendant.

Thanking you in advance for your cooperation.

Very truly yours,

William L. Howell

WLH: qd

Encl:

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