

2468

A. A. CORTE & SONS',

Plaintiff,

vs.

FLOYD McKENZIE,

Defendant.

I

I IN THE CIRCUIT COURT OF

I BALDWIN COUNTY, ALABAMA

I

AT LAW.

I

Comes the Plaintiff in the above styled cause acting by and through Chason & Stone, as its attorneys of record in said cause and files this its motion for a judgment by default in said cause and shows unto the Court and unto your Honor as follows:

That a copy of the summons and complaint in said cause was served by the Sheriff of Baldwin County, Alabama, on the Defendant in said cause on October 20, 1954, and more than thirty days have elapsed since the service thereof and the Defendant has failed to plead, answer or demur as required by law.

That the Plaintiff sued for the sum of Five Hundred Thirty-four and 60/100 Dollars (\$534.60) together with interest thereon from April 28, 1953. That such interest at the rate of 6% per annum for one year and seven months would amount to Fifty and 77/100 Dollars (\$50.77), making a total due as of this date of Five Hundred Eighty-five and 37/100 Dollars (\$585.37), for which the Plaintiff should have judgment.

Dated this 29th day of November, 1954.

Chason & Stone
Attorneys for Plaintiff.

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 Floyd McKenzie to appear within thirty 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 A. A. Corte & Sons'.

Witness my hand this 17 day of October, 1954.

Alice J. Duck
Clerk.

A. A. CORTE & SONS',

Plaintiff,

vs.

FLOYD MCKENZIE,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendant Five Hundred Thirty-four and 60/100 Dollars (\$534.60) due from him by account on, to-wit, the 28th day of April, 1953, which sum of money together with interest thereon is due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Five Hundred Thirty-four and 60/100 Dollars (\$534.60) due from him for merchandise, goods and chattels, sold by the Plaintiff to the Defendant on, to-wit, January 1, 1953, to April 28, 1953, which sum of money together with interest thereon is due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of Five Hundred Thirty-four and 60/100 Dollars (\$534.60) due from him on account stated between the Plaintiff and the Defendant on, to-wit, July 28, 1953, which sum of money together with interest thereon is due and unpaid.

Filed
10-12-54
Alice J. Duck

Shannon Stone
Attorneys for Plaintiff.