

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon O. O. Clemmons 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 12 day of October, 1954.

Amos J. ...
Clerk.

A. A. CORTE & SONS',	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
O. O. CLEMMONS,	I	AT LAW
Defendant.	I	

2410

COUNT ONE:

The Plaintiff claims of the Defendant Five Hundred Fifty Dollars (\$550.00) due by Promissory Note made by him on January 28, 1953, and payable on May 1, 1953, with interest thereon, which said note together with the interest thereon is due and unpaid.

The Plaintiff further avers that in and by the terms of said note the Defendant waived as to this debt or the collection thereof all rights and exemptions under the Constitution and Laws of the State of Alabama as to personal property and the Plaintiff does hereby claim the benefit of said waiver.

The Plaintiff further avers that in and by the terms of said note the Defendant agreed to pay all costs of collection or attempting to collect said note including a reasonable attorneys' fee and the Plaintiff alleges that the sum of One Hundred Twenty-five

Dollars (\$125.00) is a reasonable attorneys' fee in this matter and further claims of the Defendant said sum as provided in said note.

FILED

10-12-54

MADE 1. 1954

CHASON & STONE

By:

John A. Chason

Attorneys for Plaintiff.

A. A. CORTE & SONS',
Plaintiff,
vs.
O. O. CLIMMONS,
Defendant.

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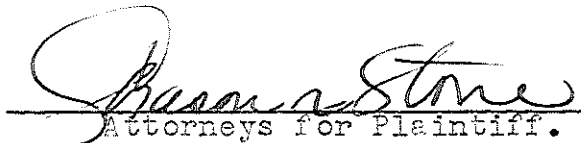
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

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 Fifty and no/100 Dollars (\$550.00) due by Promissory Note payable May 1, 1953, with interest thereon and for a reasonable attorney's fee; interest for one year and seven months at the rate of 6% per annum would amount to Fifty-two and 25/100 Dollars (\$52.25), making a total of principal and interest of Six Hundred Two and 25/100 Dollars (\$602.25); that a reasonable attorney's fee in the sum of 15% would amount to Ninety Dollars (\$90.00), making a total of Six Hundred Ninety-two and 25/100 Dollars (\$692.25) for which the Plaintiff seeks judgment.

Dated this 29th day of November, 1954.


Attorneys for Plaintiff.