

2476

BOOK 002 PAGE 954

STATE OF ALABAMA	∩	IN THE CIRCUIT COURT OF
BALDWIN COUNTY	∩	BALDWIN COUNTY, ALABAMA
	∩	AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETINGS:

You are hereby commanded to summon THE MADDOCK FOUNDATION, a corporation, to appear and answer, plead, or demur, within thirty (30) days from the service hereof, to a Bill of Complaint filed against it in Circuit Court, at Law, for said County of said State by WESTERN LUMBER COMPANY.

Witness this 14th day of Dec 1954

[Signature]
Clerk of Court

WESTERN LUMBER COMPANY, Plaintiff	∩	IN THE CIRCUIT COURT OF
vs.	∩	BALDWIN COUNTY, ALABAMA
THE MADDOCK FOUNDATION, a Corporation, Defendant	∩	AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Three Hundred Forty One Dollars and Fifty-Nine Cents (\$341.59), due from them by account on, to-wit, the 21st day of October, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Three Hundred Forty One Dollars and Fifty-Nine Cents (\$341.59), due from them on account stated between the Plaintiff and Defendant on, to-wit, the 21st day of October, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant the sum of Three Hundred Forty One Dollars and Fifty-Nine Cents (\$341.59), due from them for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 21st day of October, 1953, which sum of money, with interest thereon, is still unpaid.

[Signature]
Attorney for Plaintiff

Itemized Statement of Account
Verified by Affidavit Attached
Hereto.

[Signature]
Attorney for Plaintiff

FILED

12-14-54

ALICE J. DUCK, Clerk

Received 17 day of Dec 1954

on 18 day of Dec 1954

Received a copy of the within

E. G. Rickard, Jr.

service on

TAYLOR WILKINSON, Sheriff

Fairhope, Alabama, D. S.

Ernest M. Bailey

24763

BILL OF COMPLAINT

WESTERN LUMBER COMPANY,
Plaintiff

vs.

THE MADDOCK FOUNDATION,
a corporation,
Defendant

FILED

12-14-54

ALICE J. DUCK, Clerk

Defendant may be served by
service on E. G. Rickard, Jr.
Fairhope as a Trustee for the
Defendant.

ERNEST M. BAILEY
ATTORNEY AT LAW
FAIRHOPE, ALABAMA

WESTERN LUMBER COMPANY)
Plaintiff)
vs)
THE MADDOCK FOUNDATION,)
a Corporation)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Case # 2476

Comes the Plaintiff in the above styled cause, and after first showing the Defendant failed to appear and answer, plead, or demur within the time prescribed, moves that the Court grant a judgment by default in the said cause.

This the 25th day of January, 1955.

Samuel H. Bailey
Attorney for the Plaintiff

FILED
1-25-55
ALICE J. BUCK, Clerk