

2744

MOBILE FIXTURE &
EQUIPMENT COMPANY,
INC.,

Plaintiff,

vs.

W. M. McDILL, Individually
and doing business as Red
Top Grill,

Defendant.

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

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

1. That personal service of a copy of the summons and complaint filed in said cause was had upon the Defendant on October 15, 1955, and more than thirty days have elapsed since service thereof and the Defendant has failed to plead, answer or demur to the complaint filed in said cause.

2. That the Defendant is justly indebted to the Plaintiff in the sum of Eighty-five and 64/100 Dollars (\$85.64), together with interest thereon at the rate of six per cent. (6%) per annum from April 14, 1955, or the sum of Three Dollars (\$3.00), making a total due of Eighty-eight and 64/100 Dollars (\$88.64).


Attorneys for Plaintiff.

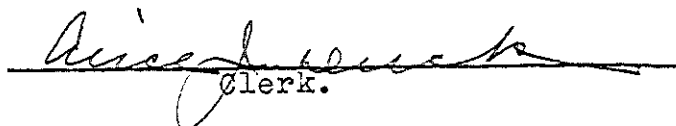
STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. M. McDill, Individually and doing business as Red Top Grill, 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 Mobile Fixture & Equipment Co., Inc.

Witness my hand this 11 day of October, 1955.


Clerk.

MOBILE FIXTURE &
EQUIPMENT CO., INC.

Plaintiff,

vs.

W. M. McDILL, Individually,
and doing business as Red
Top Grill,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Eighty-five and 64/100 Dollars (\$85.64) due from him by account on, to-wit: February 14, 1955, which sum of money together with interest thereon is due and unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Eighty-five and 64/100 Dollars (\$85.64) due from him on account stated between the Plaintiff and Defendant on, to-wit: April 14, 1955, which sum of money together with interest thereon is due and unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant Eighty-five and 64/100 Dollars (\$85.64) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from, to-wit: December 7, 1954, to April 14, 1955, which sum of money together with interest thereon is due and unpaid.


Attorneys for Plaintiff.