

3618

E. K. HARDISON SEED COMPANY,)
Plaintiff,)
-VS-)
RIEMERS COMPANY, INC.,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

MOTION FOR JUDGMENT BY DEFAULT

Comes the Plaintiff in the above styled cause and shows unto the Court that more than thirty (30) days have elapsed since service of Summons and Complaint, and that the Defendant has failed to this date to plead, answer or demur therein. Plaintiff therefore moves for judgment by default on verified Complaint in the above styled cause.


Attorney 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 Riemers Company, Inc., to appear within thirty (30) 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 E. K. Hardison Seed Company.

WITNESS my hand this the 23 day of July, 1958.

Alice J. Luck
Clerk

- COMPLAINT -

E. K. HARDISON SEED COMPANY,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
-vs-)	BALDWIN COUNTY, ALABAMA
RIEMERS COMPANY, INC.,)	AT LAW
)	
Defendant.)	

COUNT I

The Plaintiff claims of the Defendant Seven Hundred Sixty Dollars (\$760.00) for merchandise, goods and chattles sold by the Plaintiff to the Defendant on, to-wit, the 12th day of July, 1957, which sum of money, with the interest thereon, is still unpaid.

There is attached hereto and specifically made a part hereof a verified statement of the account above set out.

E. K. Hardison
Attorney for Plaintiff

STATE OF TENNESSEE

DAVIDSON COUNTY

Before me, Mrs. Harmon Hessey, a Notary Public in and for said County in said State, personally appeared Frank T. McCoy, Jr., who, being by me duly and legally sworn, deposes and says that he is President of the firm of E. K. Hardison Seed Company, and that as such officer he is familiar with the accounts due said company; that the annexed (or foregoing) statement of the account due said firm by Riemers Company, Inc., of Foley, Alabama, is just, true and correct, and that there is now due on the principal amount of said account, Seven Hundred and Sixty Dollars (\$760.00), with interest from October 1, 1957, after deducting all just credits and off sets.

Frank T. McCoy, Jr.
Frank T. McCoy, Jr.
President

Sworn to and subscribed before me on this the 14th day of July, 1958.

Mrs. Harmon Hessey
Notary Public, Davidson County,
State of Tennessee
My Commission Expires October 31, 1960

3618 ✓

Received 23 day of July 1958
at on 15 day of August 1958
served a copy of the within B & C
Riemers Company
William Riemers, Inc.
service on _____

TAYLOR WILKINS, Sheriff
By Charles D. Duck D. S.

Foley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
BY Charles D. Duck Sheriff
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

E. K. HARDISON SEED COMPANY,
Plaintiff,

-VS-

RIEMERS COMPANY, INC.,
Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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FILED
JUL 23 1958
ALICE J. DUCK, Clerk.

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA