

SEARS, ROEBUCK AND COMPANY,
A Corporation,

Plaintiff

Vs.

BURNS PHILLIPS,

Defendant

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

No.

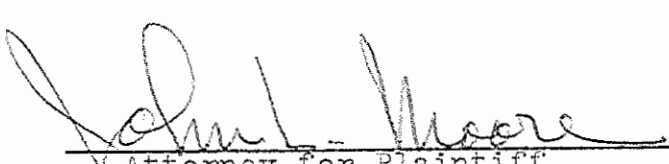
3760

COUNT ONE

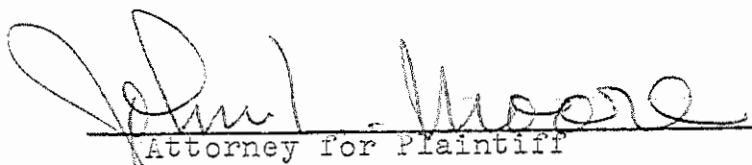
Plaintiff claims of the Defendant the sum of
Three Hundred Seventy-five and 82/100 (\$375.82) Dollars, due
from him by account on to-wit: 13th day of December, 1958,
which sum of money with interest thereon is still due and
unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of
Three Hundred Seventy-five and 82/100 (\$375.82) Dollars,
for merchandise, goods and chattels sold by the Plaintiff
to the Defendant, which sum of money with interest thereon
is still due and unpaid.


Attorney for Plaintiff

A verified statement of this account is attached
hereto and forms a part thereof.


Attorney for Plaintiff

Defendant may be served at:

Box 366

Battles Wharf, Alabama

Invoice
SEARS, ROEBUCK AND CO.

Local Address 51 S. Royal St.
City Mobile State Alabama

Date December 13, 1958

Re: Burns Phillips
Box 366
Battles Wharf, Alabama

Your Order No. _____

Our Acct. No. HNB956713

Terms: Cash 10th of month after
delivery -- NO DISCOUNT

Kindly mention our account number when remitting or writing regarding this invoice

Quantity	DESCRIPTION	Unit Price	Total Price
	Balance owing on washing machine and stove		375.82
	Personally, before me appeared, D.B. Hinds, who after being duly sworn deposes and states that he is Credit Manager for SEARS, ROEBUCK AND CO., Mobile, Alabama that he is familiar with the accounts due said Company, that he has personal knowledge of the account described herein and that the foregoing balance is just, due and unpaid.		
	SEARS, ROEBUCK AND CO. By <u>D.B. Hinds</u> Credit Manager		
	Subscribed to and sworn to before me this <u>13th</u> day of <u>Dec</u> , 19 <u>58</u> .		
	<u>Mary J. Jones</u> Notary Public		
	<u>Mobile</u> County, State of <u>Ala.</u>		
	My Commission expires <u>3-6</u> , 19 <u>62</u> .		

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Burns Phillips

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Burns Phillips

....., Defendant

by Sears, Roebuck and Company, A Corp

....., Plaintiff

Witness my hand this 5th day of February 19 59

Verice J. Smith Clerk

John L. Moore
Attorney at Law
736 First National Bank Building
Mobile, Alabama
Phone HE 3-3815

February 3, 1959

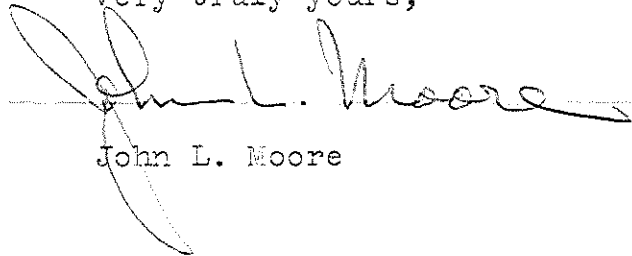
Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

You will please find enclosed herewith a complaint in the matter styled Sears, Roebuck and Company, a Corporation, Plaintiff Vs. Burns Phillips, Defendant that I would thank you to file. You will please note that the Defendant may be served at Battles Wharf, Alabama.

Thanking you for your co-operation, I am

Very truly yours,

A handwritten signature in dark ink, appearing to read "John L. Moore", with a large, sweeping flourish extending from the end of the name.

John L. Moore

JLM:ck

Enc.

John L. Moore

Attorney at Law

736 First National Bank Building

Mobile, Alabama

Phone HE 3-3815

April 9, 1959

Mrs. Alice J. Duck
Circuit Clerk
Baldwin County
Bay Minette, Alabama

Re: Sears, Roebuck and Company Vs.
Burns Phillips, Case No. 3760

Dear Mrs. Duck:

You will find enclosed herewith a card from your office advising that personal service was had on the defendant on March 7, 1959. Inasmuch as I have had no notice of any answer from the defendant, would it be in order for me to have a default judgment entered in this matter. I note that on my complaint it has been written as follows, "a verified statement of this account is attached hereto and forms a part thereof". If a default judgment is entered, I would thank you to send me a certificate of judgment.

Very truly yours,

John L. Moore

John L. Moore

JLM:ck

Enc.

375-82
22.54.92
752
30.06
375-82
405.88