

WORLD WIDE PACKAGING AND
CRATING ENGINEERS, INC.,
a corporation

PLAINTIFF

vs.

TECHNICAL SERVICES, INC.,
a corporation

DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

) NO. 4550

DEMURRER

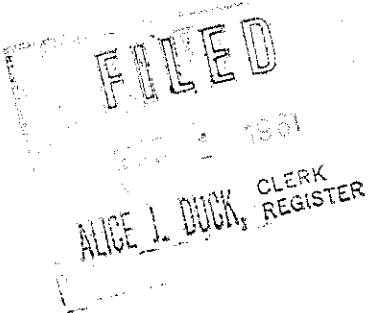
Comes the defendant in the above style cause and answers to the bill of complaint and for grounds states, separately and severally as follows:

- (1) Bill of complaint served upon the defendant did not have a copy of the verified statement of account attached thereto.
- (2) The bill of complaint does not state what interest is due thereon.

TECHNICAL SERVICES, INC.,

BY: *Clark P. Farrow*

For the trial of this cause, the defendant demands a trial by jury.



WORLD WIDE PACKAGING AND)
CRATING ENGINEERS, INC.,)
A CORPORATION)

PLAINTIFF)

VS.)

TECHNICAL SERVICES, INC.,)
A CORPORATION,)

DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CASE NO. 4550

MOTION FOR
DEFAULT JUDGMENT

Comes now Plaintiff in the above styled cause and
says as follows:

1. That on, to-wit, the 13th day of January, 1961,
the case styled as above was filed in this Honorable Court.
2. That on, to-wit, the 27th day of January, 1961,
personal service was had on the defendant in the above styled
case.
3. That more than thirty (30) days have elapsed
since such personal service without the defendant having
pled, answered or demurred to the Complaint served upon it.
4. That said Complaint was accompanied by an
itemized verification of account showing a principal balance
of \$2,587.49 plus interest since December 1, 1960, which said
interest amounts to the sum of \$38.81, making a total indebted-
ness of \$2,626.40.

WHEREFORE, Plaintiff moves this Honorable Court to
enter a judgment by default in favor of Plaintiff and against
Defendant in the amount of \$2,626.40.

HOLBERG, TULLY, HODNETTE & MOBLEY
Attorneys for Plaintiff

BY 
Of Counsel

FILED
MAR 2 1961
ALICE J. DUCK, Clerk

STATE OF ALABAMA

COUNTY OF BALDWIN

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Technical Services, Inc., a corporation, to appear within thirty days from service of this process, in the Circuit Court of Baldwin County, Alabama, at the place of holding of same, then and there to answer the complaint of World Wide Packaging and Crating Engineers, Inc., a corporation.

WITNESS: Alice J. Duck, Clerk of said Court, this 13 day of January, 1961.

ATTEST: Alice J. Duck
Clerk

SHERIFF'S RETURN

Received 13 Day of January, 1961, and on the 27 day of January, 1961, I served a copy of the within Complaint and Summons on Technical Services, Inc., a corporation, by service on Charles R. Forrest President.

TAYLOR WILKINS, SHERIFF

Ex-1-27-61

BY W. D. James D.S.

MA 4550

World Wide Packaging
Crating & Engineering Co

vs.

Technical Services, Inc.

Received 13 day of Jan 1961
on 27 day of Jan 1961
Received a copy of the within 20c
Technical Services Inc

service on Charles P. Faurest
President
TAYLOR WILKINS, Sheriff

By W. O. Garner D. S.
Thope

Sheriff claims 70 miles at
3 Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Garner
DEPUTY SHERIFF

Filed 1-13-61
Alice J. Neuch
Clerk

LAW OFFICES
HOLBERG, TULLY, HODNETTE AND MOBLEY

1107 MILNER BUILDING
P. O. BOX 47

MOBILE, ALABAMA

TELEPHONE
HEMLOCK 2-8863

RALPH G. HOLBERG, JR.
ALBERT J. TULLY
ROBERT E. HODNETTE, JR.
JOHN W. MOBLEY
HERBERT P. FEIBELMAN, JR.

January 12, 1961

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

Dear Mrs. Duck:

Enclosed please find the original and one copy of Complaint and Summons in the case of WorldWide Packaging and Crating Engineers, Inc., a corporation, Plaintiff, vs. Technical Services, Inc., a corporation, Defendant. I should appreciate it if you would consider them herewith filed in your Court and take whatever necessary action to place it on the docket and have service made.

Very sincerely yours,

HOLBERG, TULLY, HODNETTE & MOBLEY

BY


HERBERT P. FEIBELMAN, JR.

HPF, JR/gm
Encl.

204556
World Wide Packaging
Crating & Engineering Co

vs.

Technical Services, Inc.

Filed 13 day of Jan 1961
on 27 day of Jan 1961
within 20 days
Technical Services Inc

Service on Charles P. Forrest
President
TAYLOR WILKINS, Sheriff
By W. C. Garner D. S.
J. Hope

Sheriff claims 70 miles at
Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Garner
DEPUTY SHERIFF

Filed 1-13-61
Alice J. Alcock
Clerk

ACCOUNT NO. _____

NAME _____

TERMS _____

ADDRESS _____

RATING _____

CREDIT LIMIT _____

DATE 19 <u>62</u>	ITEMS	FOL.	DEBITS	CREDITS	DR OR CR.	BALANCE
						7057.64
Sept. 12	Dw. # 011601 127182 # 754		268.60			170624
Sept 12	Dw. # 755 011601 26578		542.00			224824
Oct 20	Dw. # 799		224.28			247252
Oct 20	Dw. # 800		364.65			283717
Oct. 20	Dw. # 806		264.00			310117
Nov 10	Dw # 842		56.04			315721
Nov 14	Ch # 4695			56.04		310117
Dec 11	Cash. 3000			700.00		240117
Dec 7	Dw. # 867		186.32			221485 258749

STATE OF ALABAMA)

COUNTY OF MOBILE)

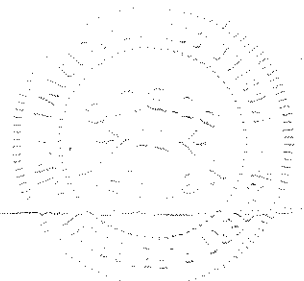
Before me, the undersigned authority in and for the aforesaid county and state, who, as a notary public, under my seal of office, which seal of office is hereto attached, personally appeared Howard D. Bridges, known to me, who, being duly sworn, upon his oath stated that he is Inc. President of World Wide Packaging and Crating Engineers a corporation organized and doing business under the laws of Alabama; a partnership composed of _____; a sole trader doing business as _____; that as such he makes this affidavit; that he is familiar with the books Inc. and business of World Wide Packaging and Crating Engineers; that the attached account against Technical Services, Inc. is just and correct within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items therein stated and composing the said account were sold and delivered to the said Technical Services, Inc. at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as therein stated and that the balance thereof amounting to the sum of TWO THOUSAND FIVE HUNDRED EIGHTY SEVEN & 49/100 \$ 2,587.49 Dollars with interest from December 1, 1960 is justly due and remains unpaid.

Howard D. Bridges

Sworn to, subscribed, acknowledged, signed and sealed before me, as a Notary Public under my seal of office, with my seal hereto affixed on this the 11th day of January, 1961.

Hubert P. Heibel
A Notary Public in and for the

State of Alabama
County of Mobile,



SHEET NO. _____

ACCOUNT NO. _____

TERMS _____

NAME *Technical Services Inc.*

RATING
CREDIT LIMIT

ADDRESS *P.O. Box 192 - Fairhope, Ala.*



DATE	ITEMS	DEBITS	CREDITS	BALANCE
	<i>Balance Brought forward from 159</i>			<i>444.51</i>
<i>Jan 7</i>	<i>Check # 4295</i>		<i>444.51</i>	<i>-0-</i>
<i>11</i>	<i>538 - 7 Units of Item 13 (01-601-26578)</i>	<i>522.32</i>		<i>522.32</i>
<i>12</i>	<i>Check # 4300 - 4305</i>		<i>200.00</i>	<i>322.32</i>
<i>14</i>	<i>Check # 4319</i>		<i>500.00</i>	<i>176.68</i>
<i>19</i>	<i># 541 - 1 Unit of #37-01(601)26578</i>	<i>91.15</i>		<i>85.53</i>
<i>19</i>	<i># 542 - 3 Units of #31-01(601)26578</i>	<i>291.48</i>		<i>205.95</i>
<i>21</i>	<i># 546 - (38-601)60-3229</i>	<i>26.58</i>		<i>242.53</i>
<i>22</i>	<i>Check # 4264 - Dr # 542 - 541-546</i>		<i>240.95</i>	<i>1.58</i>
<i>Feb 5</i>	<i># 555 - 1 Unit #30-01(601)26578</i>	<i>66.00</i>		<i>67.58</i>
<i>5</i>	<i># 556 - 3 Units #11-01(601)26578</i>	<i>117.60</i>		<i>185.18</i>
<i>5</i>	<i># 557 - 8 Units #13-01(601)26578</i>	<i>298.08</i>		<i>783.26</i>
<i>12</i>	<i># 559 - 2 Units - 01(601)26578 Item #2</i>	<i>298.20</i>		<i>1075.46</i>
<i>Mar 10</i>	<i>Dr # 578 - (38-601)60-4286</i>	<i>26.28</i>		<i>1101.74</i>
<i>Apr 7</i>	<i>Invoice # 592</i>	<i>1461.45</i>		<i>2563.19</i>
<i>Apr 15</i>	<i>Invoice # 598 (01-601)27182</i>	<i>448.95</i>		<i>3012.14</i>
<i>Apr 22</i>	<i>Dr # 603 01(601)26578</i>	<i>149.52</i>		<i>3161.66</i>
<i>Apr 22</i>	<i>Dr # 604 01(601)27182</i>	<i>361.40</i>		<i>3523.06</i>
<i>Apr 22</i>	<i>Dr # 614 - Del. Chg</i>	<i>12.95</i>		<i>3536.01</i>
<i>Apr 27</i>	<i>Credit Memo Agreement of 2 units + budget #920</i>		<i>3017.18</i>	<i>518.83</i>
<i>May 9</i>	<i>Dr # 631 - 01(601)27182</i>	<i>448.95</i>		<i>971.11</i>
<i>May 9</i>	<i>Del. Chg - " " Dr # 634</i>	<i>2.33</i>		<i>452.28</i>
<i>May 16</i>	<i>Check for 218.73 plus Credit for Cal. + Comp.</i>		<i>518.83</i>	<i>603.04</i>
<i>May 19</i>	<i>Invoice # 646 (01-601)27182</i>	<i>149.65</i>		<i>603.04</i>
<i>May 19</i>	<i>Invoice # 651 (Del. Chg on Dr # 646</i>	<i>1.11</i>		<i>603.04</i>