

M. B. KLUMPP, Individually  
and doing business as  
KLUMPP'S PLACE,

Plaintiff,

VS.

EDWARD JOHNSON,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.


C O M P L A I N T

COUNT I.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY-THREE AND 07/100 (\$143.07) DOLLARS due by account on, to-wit, the 2nd day of March, 1961; which sum of money with the interest thereon is still unpaid.

COUNT II.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY-THREE AND 07/100 (\$143.07) DOLLARS due from him on account stated between the Plaintiff and the Defendant on, to-wit, the 2nd day of March, 1961; which sum of money with the interest thereon, is still unpaid.

  
E. G. RICKARBY, Attorney for  
Plaintiff.

Received 12 day of Sept 1962  
and on 19th day of Sept 1962

I served a copy of the within on Edward Johnson

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Fred Seibert D. S.  
Pt. Clear

Sheriff claims 80 miles at  
Ten Cents per mile Total \$ 8.00  
TAYLOR WILKINS, Sheriff  
BY Seibert  
DEPUTY SHERIFF

*Filed  
9-12-62  
Alice M. Buck  
clerk*

SUMMONS AND COMPLAINT

Baldwin Times

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 EDWARD JOHNSON,

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 EDWARD JOHNSON,

\_\_\_\_\_, Defendant\_\_\_\_\_

by M. B. KLUMPP, INC. and d/b/a KLUMPP'S PLACE.

\_\_\_\_\_, Plaintiff\_\_\_\_\_

Witness my hand this 12 day of Sept 1962

Wing. Luck, Clerk

No. 5276

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

M. B. KLUMPP, Ind. and d/b/a

KLUMPP'S PLACE,

vs.

Plaintiffs

EDWARD JOHNSON

RFD Thayer

Defendants

**SUMMONS and COMPLAINT**

Filed

9-14

, 19

62

Wing Hucker, Clerk

E. G. Rickarby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

R. F. D.  
Fairhope, Alabama.

RECEIVED IN OFFICE

, 19

Sheriff

I have executed this summons

this 14th day of Sept, 19 62  
by leaving a copy with

Edward Johnson

Sheriff

Deputy Sheriff

LAW OFFICES  
**E. G. RICKARBY**  
392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

February 25, 1963

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

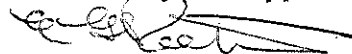
Dear Mrs. Duck:

Re: M. B. Klumpp, Ind. & d/b/a Klumpp's Place  
Vs: Edward Johnson  
Case No. 5276  
Our File: 62-52

In this case, I said I would take a judgment on an itemized and verified statement. I do not have an itemized and verified statement of account. I believe our Baldwin County Court rules entitle me to a judgment by affidavit.

Request judgment by default under affidavit for the balance due under this claim of \$53.07, plus costs.

Yours very truly,



EGR/ts  
encl - affidavit

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Before me, the undersigned notary public, personally appeared M. B. KLUMPP, who, being first duly sworn, deposes and says that he is the plaintiff in the case of M. B. KLUMPP, Individually and doing business as KLUMPP'S PLACE, versus EDWARD JOHNSON, Case No. 5276, Circuit Court of Baldwin County, At Law, and that, at the time of filing this suit EDWARD JOHNSON was justly indebted to him in the sum of ONE HUNDRED FORTY-THREE AND 07/100 (\$143.07) DOLLARS, and that said claim was in the hands of an attorney M. B. KLUMPP has received payments in the sum of NINETY DOLLARS (\$90.00), leaving a balance due on this claim of FIFTY-THREE AND 07/100 (\$53.07) DOLLARS, plus the costs of Court, and he asks for a judgment for this amount.

M B Klumpp  
Affiant

Sworn to and subscribed before me on this the 11th day of  
Feb, 1963.

W. S. Behn  
Notary Public, Baldwin County, Alabama.

E. G. RICKARBY  
LAWYER  
BOX 71 FAIRHOPE, ALABAMA • WA 8-9836

MESSAGE

TO Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

DATE September 10, 1962

Re: Klumpp vs. Johnson File-62-52

Dear Mrs. Duck:

With this we are handing you  
summons and complaint in the case of  
Klumpp's Place vs. Edward Johnson.

Please process, and oblige.

Yours very truly,



sy ts

INSTRUCTIONS TO SENDER:

1. KEEP YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

REPLY

DATE

SIGNED

INSTRUCTIONS TO RECEIVER:

1. WRITE REPLY. 2. DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

Ms. 5216

TELEPHONE WA 8-9836

LAW OFFICES

P. O. BOX 71

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

10 Sept 62

Klump ~  
Johnson

Household Regs. Williams.  
Shiriff  
Bay Menette.

This paper is on Ed Johnson he lives  
on the corner of Greens & Marlow Rds. I think  
he works at a filling station in Summerdale.

R.

REPLY:

DATE:

LAW OFFICES  
E. G. RICKARBY  
P. O. BOX 71  
FAIRHOPE, ALABAMA

February 23, 1963

Mr. M. B. Klumpp  
Point Clear, Alabama

Dear Melvin:

Re: M. B. Klumpp, Ind., and d/b/e KLUMPP'S PLACE  
Vs: Edward Johnson  
Case #5276  
Our File: 62-52

The Judge wants us to take a judgment in this case and I've got to have some testimony. Please sign the enclosed affidavit, return it to me in the enclosed self-addressed envelope and I'll notarize it and send it up.

Yours very truly,

EGR/wrt

encl.

cc: Mrs. Alice Duck, Clerk



LAW OFFICES  
E. G. RICKARBY  
392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

November 8, 1963

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

Dear Mrs. Duck:

Inre: M. B. Klumpp  
Vs: Edward Johnson  
Case No. 5276  
Our File: 62-52

Enclosed find check in the above styled cause, paying  
of the costs on this judgment.

Please have this judgment dismissed and cancelled on  
the records as defendant has paid it. ~~I am enclosing~~  
release. *not recorded*

Yours very truly,



ts  
encl.