

TEXAS REFINERY CORPORATION,  
a corporation,

Plaintiff,

Vs.

V. M. LOWELL, individually and  
d/b/a V. M. LOWELL MOTEL,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendants in the above styled cause and files this his appeal from the judgment and verdict of the Justice Court of R. A. Hall, Jr., and by way of answer to the Complainant's Complaint says as follows:

1.

Before me, the undersigned authority, personally appeared V. M. Lowell who is known to me, and who being by me first duly sworn, deposes and says, that he is not indebted to the Plaintiff for the amount sued for nor any amount.

V. M. Lowell

Sworn to and subscribed before me this the 27<sup>th</sup> day of October, 1962.

Phyllis  
Notary Public

2.

The Defendants plea a general issue with leave to give in evidence any matter which if specifically pleaded would be a good defense to this cause of action.

WILTERS, BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit  
Attorney for the Defendants

TEXAS REFINERY CORPORATION,  
a corporation,

Plaintiff

Vs.

V. M. LOWELL, individually and  
d/b/a V. M. LOWELL MOTEL,

Defendants.

Y

Y

Y

Y

Y

Y

IN THE JUSTICE COURT OF

R. A. HAIL, JR.

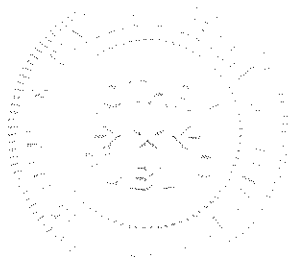
BALDWIN COUNTY, ALABAMA

Before me, the undersigned authority, personally appeared  
V. M. Lowell who is known to me, and who being by me first duly  
sworn, deposes and says, that he is not indebted to the Plaintiff  
for the amount sued for nor any amount.

V. M. Lowell

Sworn to and subscribed before me this the 27<sup>th</sup> day of Octo-  
ber, 1962.

Phyllis S. Meser  
Notary Public



TEXAS REFINERY CORPORATION,  
a corporation,

Plaintiff,

Vs.

V. M. LOWELL, individually and  
d/b/a V. M. LOWELL MOTEL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendants in the above styled cause and files this his appeal from the judgment and verdict of the Justice Court of R. A. Hail, Jr., and by way of answer to the Complainant's Complaint says as follows:

1.

Before me, the undersigned authority, personally appeared V. M. Lowell who is known to me, and who being by me first duly sworn, deposes and says, that he is not indebted to the Plaintiff for the amount sued for nor any amount.

V M Lowell

Sworn to and subscribed before me this the 27<sup>th</sup> day of October, 1962.

Phyllis S. Nesbit  
Notary Public

2.

The Defendants plea a general issue with leave to give in evidence any matter which if specifically pleaded would be a good defense to this cause of action.

WILTERS, BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit  
Attorney for the Defendants

TEXAS REFINERY CORPORATION,  
a corporation,

Plaintiff,

Vs.

V. M. LOWELL, individually and  
d/b/a V. M. LOWELL MOTEL,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

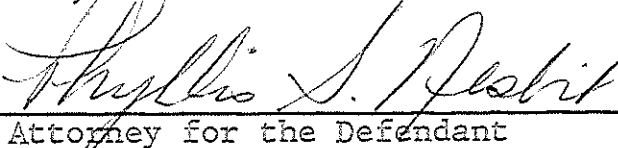
Comes now the Defendant in the above styled cause and amends his plea heretofore filed in this cause by adding the following:

2.

For further answer to the Complainant's Complaint, the Defendant says that the money sued for is for roofing material sold to the Defendant by the Plaintiff. The Defendant says further that at the time this material was sold to him the Plaintiff, acting by and through its authorized agent, did warrant and guarantee that the roofing material when applied would stop all the leaks in the roof of the building on which it was to be applied. That the Defendant did obtain this roofing material and applied the same according to the instructions given to the Defendant by the aforesaid agent. That the material did not, in any way, stop the leaks in his roof. Hence, he is not obligated to the Plaintiff. The Defendant says further that the aforesaid agent guaranteed this roofing material to stop the leaks on his building and said further that if it did not, that there would be no cost for said material.

WILTERS, BRANTLEY & NESBIT

BY:

  
Attorney for the Defendant

FILED

MAR 7 1963

ALICE L. DUCK, CLERK  
REGISTER

5352

TEXAS REFINERY CORPORATION,  
a corporation,

Plaintiff,

Vs.

V. M. LOWELL, individually and  
d/b/a V. M. LOWELL MOTEL,

Defendant.

FILED

MAR 2 1963

ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO. - BAY MINETTE, ALA.

The State of Alabama, }  
Baldwin County

In The Justice Court Of

R. A. HAIL, JR.

To Any Lawful Officer of Said County, Greetings:

Summon V. M. LOWELL,

to appear before me on the 27th day of October 11;00AM 1962, next, at my office  
in Robertsdale, Baldwin County, Alabama, to answer the complaint of  
TEXAS REFINERY CORPORATION, a corporation,  
and then and there make a return of this summons.

Issued the 6th day of October 1962

*R. A. Hail, Jr.*

Justice of the Peace.

COMPLAINT

TEXAS REFINERY CORPORA-

TION, a corporation,

Plaintiff

VS.

V. M. LOWELL, Individually

and doing business as V. M.

LOWELL MOTEL,

Defendant

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED AND NO/100 (\$100) Dollars  
due from him by account on, to-wit; the 27th day of July, 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 AND  
NO/100 (\$100.00) DOLLARS due from him for merchandise, goods and  
chattels sold by the Plaintiff to the Defendant on, to-wit; the  
27th day of July, 1961; which sum of money with the interest  
thereon is still unpaid.

*E. G. Rickarby*  
E. G. Rickarby, Attorney for Plaintiff.

NOTE: The account sued on is evidenced by an itemized and verified  
statement of account filed herewith.

*E. G. Rickarby*

Plaintiff's Attorney

E. G. Rickarby

1329

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama

Baldwin County

In the Justice Court of

R. A. HAIL, JR.

27th October 11:00 AM Term, 19 62

SUMMONS and COMPLAINT

TEXAS REFINERY CORPORATION, XXXXX

a Corporation.

Vs. Plaintiff

V. M. LOWELL

Defendant

The Defendant is hereby notified that  
Writ of Garnishment has been served on

J. P.

Location: Robertsdale, Ala.

In Garrett Bldg upstairs  
at rear of hall.

Executed by personal service and notice of

Garnishment

this 11th day of Oct 1962

Constable

By

C. A. McNeil, D.S.

21 miles

# Texas Refinery Corp.

EXECUTIVE OFFICES: 830-850 NORTH MAIN STREET • FORT WORTH 1, TEXAS

CHARGE TO

Y M LOWELL MOTEL  
Hwy 90  
BALDWIN COUNTY  
LOXLEY ALA

SHIP TO

QUANTITY	UNIT PRICE	AMOUNT	TAX
062761	26971	09	99
JACK		GE	2
SALESMAN			

JACK

N

TERMS			
7 27 61			
WHAT SHIPPED	DESCRIPTION	QUANTITY	UNIT PRICE
1	55 MIGHTYPLATE ROOF COATING	55	192
1	TRC GLASWEB 12 IN.	1	785
1	BRUSH		NC
SPECIAL JUNE DISCOUNT			113.45
STATE TAX			7.67
			3.23
			111.01
VIA BAGGETT TRANSFER TO MOBILE BALDWIN TRANSFER TO DESTINATION			

OFFICES AND PLANTS  
FORT WORTH • TORONTO • MOOSE JAW, SASK.



This invoice gratefully says  
"Thanks for your Order!" Your  
Panther Products are speeding  
your way! By properly using  
these products as soon as they  
arrive, you save your valued  
property, costly repairs, care  
and worry.



MAKING AND KEEPING FRIENDS IS OUR MOST IMPORTANT PURPOSE



## APPEAL BOND

THE STATE OF ALABAMA,  
Baldwin County

KNOW ALL MEN BY THESE PRESENTS:

That we, V. M. Lowell and J. C. Grimes

are held and firmly bound unto Texas Refinery Corporation, a corporation  
in the sum of \_\_\_\_\_ DOLLARS,

for the payment of which, well and truly to be made, we bind ourselves and each of us, our and each of our  
heirs, executors and administrators, jointly and severally. But upon condition, that if the above bound

V. M. Lowell shall prosecute to effect an appeal by him taken this day to  
the next term of the Circuit Court of Baldwin from a judgment

rendered against him in favor of said Texas Refinery Corporation

by R. A. Hail, Jr., a Justice of the Peace for said County, for the  
sum of \_\_\_\_\_ Dollars, debt

in said appeal, shall pay such judgment, both as to debt and costs as may be rendered against him by the

said Circuit Court then, in either

of said events, this obligation to be void, otherwise to remain in full force and effect.

Given under our hands and seals, this the 27<sup>th</sup> day of October 1962 ~~1961~~

Approved:

*Protestant*

27 Oct 1962

J. P.

V. M. Lowell (L. S.)  
J. C. Grimes (L. S.)  
\_\_\_\_\_ (L. S.)