

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

January 28, 1963

5448

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

Dear Mrs. Duck:

Re: Firestone Tire & Rubber Company, Inc., a corporation
Vs: Robert A. Breedin, ind. and d/b/a M & M PRODUCE CO.
Our File: 63-13

Enclosed find summons and complaint in the above styled
cause. Please process and oblige and hand the enclosed
letter to the Sheriff.

Yours very truly,



EGR/wrt
Encl.
cc: (dup.) Client
2/29/63

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

March 1, 1963

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

Dear Mrs. Duck:

Re: Firestone Stores
Vs: M & M Produce Co., Robert A. Breedin
Our File: 63-13
Case No. 5448

Request judgment by default on an itemized and verified
statement of account for principal, \$1250.00, interest,
\$109.37, making a total of \$1359.37.

Please mail me the certificate of judgment, and oblige.

Yours very truly,



EGR/ts
3/15/63
cc: Messrs. Moody & Higgins

FIRESTONE TIRE & RUBBER
COMPANY, INC., a corporation,

Plaintiff,

VS.

ROBERT A. BREEDIN, ind. and
d/b/a M & M PRODUCE CO.,

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 TWELVE HUNDRED AND FIFTY AND NO/100 (\$1250.00) DOLLARS due from him by account on, to-wit, the 15th day of September, 1961; which sum of money with the interest thereon is still unpaid.

(Count II)

The Plaintiff claims of the Defendant TWELVE HUNDRED AND FIFTY AND NO/100 (\$1250.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 15th day of September, 1961; which sum of money, with the interest thereon, is still unpaid.

(Count III)

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED AND FIFTY AND NO/100 (\$1250.00) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 30th day of August, 1961, and the 15th day of September, 1961; which sum of money, with the interest thereon, is still unpaid.


E. G. RICKABY, Attorney
for Plaintiff.

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


Attorney for Plaintiff.

FILED

JAN 29 1963

WILLIE J. DUCK, CLERK
REGISTER

COUNTY OF Mobile

STATE OF Alabama

Be it remembered, that on this 4th day of January

A. D., 1963, personally appeared before me, the undersigned authority, John R. Freeman known to me

who being duly sworn, upon his oath stated that he is Credit Manager
of Firestone Tire & Rubber Company, Inc.

{ a corporation organized and doing business under the laws of the State of Ohio
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of

a sole trader doing business as Firestone Tire & Rubber Co., Inc.
and that as such he makes this affidavit; that he is familiar with the books and business of said
Firestone Tire & Rubber Co., Inc.; that the attached account against
Robert A. Breedin d/b/a M & M Produce Co. of

is just and correct, within the knowledge of this affiant, that the items thereon stated and composing
the said account were sold and delivered to said Robert A. Breedin d/b/a M & M Produce Co.

at { its
their } special instance and request, that credit has been duly given for all payment and just
his

and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof,
amounting to the sum of Twelve Hundred Fifty and 00/100 Dollars
(\$ 1,250.00) with interest from September 15, 19 61 is justly due and
remains unpaid.

John R. Freeman X

I hereby certify under my official seal that I am authorized as a Notary Public
to administer oaths under the laws of the State of Alabama
and that the foregoing was subscribed and sworn to before me on the day and
year first above stated.

John R. Freeman
Notary Public

County of Mobile, AL State of Alabama
My commission expires _____ A. D. 19 _____

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 ROBERT A. BREEDIN

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 ROBERT A. BREEDIN,
ind. and d/b/a M & M PRODUCE CO., Defendant.....

by FIRESTONE TIRE & RUBBER COMPANY, INC., a corporation

_____, Plaintiff.....

Witness my hand this

29

day of

January

1963

Beirf. Ruck, Clerk

Exp-1-31-63

No. 5448

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

FIRESTONE TIRE & RUBBER COMPANY,
INC., a corporation,

vs. Plaintiffs

ROBERT A. BREEDIN, ind. and
d/b/a M & M PRODUCE CO.,

Defendants

SUMMONS and COMPLAINT

Filed **FILED**, 19

JAN 20 1963

ALICE J. DUCK, CLERK
REGISTER

E. G. Rickarby
Attorney at Law
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

RECEIVED IN OFFICE

JAN. 29, 1963

Sheriff

I have executed this summons

this 31st day of Jan, 1963

by leaving a copy with

Robert A. Breedin

Sheriff claims

70 miles at 7.00
Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins
Deputy Sheriff

Sheriff

Deputy Sheriff

Joachim Oakley

Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

3-25-61

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT

SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]

THE STONE STORIES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
SHOWN IS BALANCE
OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

4-25-61

M & M Produce Co

E DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			921 96
1-83 Section, tube repair	17 88		
783 Cash		190 00	
794 Cash		180 00	
9-5 Tire, tube Repair	73 83		643 67

FIRESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

5-25-61

M & M Produce Co

E DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			643 67
1-71 Tires, tubes	552 95		
1-54 Tires, tubes	552 95		
7-12 Tires, flag	11 58		
087 Coak		429 04	
1-1 Battery	63 17		
2-20 FT	39 56		
3-50 Tire pw	12 00		1446 84

FIRESTONE STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

6-25-67

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			1446 84
5-96 FT, section repair	291 00		
6-24 Tire, tubes	93 07		
6-74 Battery	14 15		
6-73 Top Trend	279 09		
462 Cash		300 00	
3-67 Tire rw	12 00		
1-59 Battery	31 59		
577 Cash		192 00	1675 74

FIRESTONE STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

7-25-61

M & M Produce Co

IS DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES		CREDITS		BALANCE DUE
BALANCE BROUGHT FORWARD					1675 74
1-87 Tires, Tubes	263	29			
4-1 Battery	31	29			
0-82 Top Treads	70	45			
1-91 Battery	63	27			
3-63 Retreads	105	90			
8-36 Top Treads, Rein	58	36			
446 Cash			755	00	
0-9 Serv.	6	70			1520 00

FIRESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

8-25-61

M & M Produce Co

E DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES		CREDITS		BALANCE DUE
BALANCE BROUGHT FORWARD					1520 00
2-37 Tires, tubes	267	66			
3-76 Tires, tubes	13	76			
5-6 Service	10	70			
7-30 FT	106	08			
8-70 Tires, tubes	249	46			
11-13 Cash			410	00	
10-58 Battery	41	89			
9-82 Tire, RW	20	70			
30-43 Top Reader	141	40			1961 65

FIRESTONE STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

9-25-61

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			1961 65
2-96 FTe, Valves	72 70		
4-80 Tire, tubes	249 47		
5-50 Credit Memo		20 70	
7-40 Tire, SW.	2 00		
7-22 Toy Tread, Toll	108 40		
8-5 Tire, Tube	835 21		
8-13 Tire	124 15		
10-84 Tire, tubes	263 29		
186 Cash		939 00	2757 17

FIRESTONE STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

10-25-61

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			2757 17
-69 Tires, Tubes	217 40		
-6 Truck Ftr	53 73		
1-40 FT	71 69		
2-68 Srv chg	77 0		
3-52 Top Treads	102 60		
5-75 Tires	83 86		
5-92 Top Treads	107 08		
8-93 FT, Top Treads	59 75		
567 Cash		600 00	2860 98

FIRESTONE STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

11-25-61

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

ITEM	CHARGES	CREDITS	BALANCE DUE
BALANCE BROUGHT FORWARD			2860 98
6-83 Tire Repair, Tall	3 70		
8-54 FT, Tubes	26 98		
8-51 Valves	2 08		
8-10 " "	3 12		
9-17 Cash		320 22	2576 64

FIRESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

12-25-61

M & M Produce
Daphne, Ala

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
 INSURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]

FILESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
SHOWN IS BALANCE
OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

1-25-62

M & N Produce Co

E DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT

SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]

FIRESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
SHOWN IS BALANCE
OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. - Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

3-25-62

M & M Produce Co

BE DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]

FLINTSTONE STORIES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
SHOWN IS BALANCE
OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

4-25-62

M & M Produce Co

E DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT

SURE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]

FIRESTONE STORES

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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OF YOUR ACCOUNT
AS OF ABOVE DATE



Firestone STORES

210 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

STATEMENT DATE

5-25-62

M & M Produce Co

DUE AND PAYABLE AT ABOVE ADDRESS ON 10TH OF MONTH FOLLOWING DATE OF STATEMENT
 USE PROPER CREDIT DETACH AND RETURN ABOVE STUB WITH YOUR REMITTANCE.

[illegible]**FIRESTONE STORES**

10 St. Louis St. Phones: HE 3-2635 3-2636 3-2637
MOBILE, ALABAMA

LAST AMOUNT
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