

41868

JACK COCKE,  
Individually and doing  
business as Walter Kidde  
Sales and Service,

Plaintiff,

vs.

AUGUSTA MCCOVERY,

Defendant.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

PLEA:

Comes now the Defendant in the above styled cause,  
by his attorneys, and for answer to the complaint and to each count  
thereof, separately and severally, pleads as follows:

1. That the allegations of the complaint are untrue.

CHASON & STONE

FILED

SEP 28 1961

ALICE A. DICK, CLERK  
REGISTER

By: John Earle Chason  
Attorneys for Defendant

JACK COCKE,  
Individually and doing  
business as Walter Kidde  
Sales and Service,

Plaintiff,

vs.

AUGUSTA MCCOVERY,

Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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PLEA

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FILED

SEP 28 1961

ALICE J. DUCK, CLERK  
REGISTER

CHASON & STONE

ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

E. G. RICKARBY

392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

September 11, 1961

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

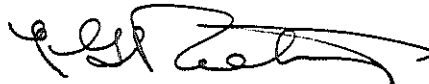
Dear Mrs. Duck:

Re: Walter Kidde Sales & Service  
Vs: Augusta McCovery  
Our File: 5492

With this we are handing you Summons and Complaint,  
together with itemized and verified statement of  
account, in the above styled cause.

Please process and have the sheriff serve papers  
on defendant, and oblige.

Yours very truly,



ts  
encl.  
cc: Mr. Jack Cocke

JACK COCKE, Individually and  
doing business as  
WALTER KIDDE SALES & SERVICE,

Plaintiff,

-VS-

AUGUSTA MCCOVERY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

C O M P L A I N T

Count I.

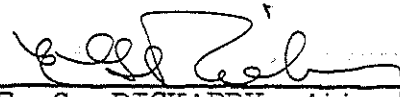
The Plaintiff claims of the Defendant TWO HUNDRED FORTY-  
FOUR AND 48/100 (\$244.48) Dollars due from him by account on, to-  
wit, the 27th day of February, 1961; which sum of money with the  
interest thereon is still unpaid.

Count II.

The Plaintiff claims of the Defendant TWO HUNDRED FORTY-  
FOUR AND 48/100 (\$244.48) DOLLARS due from him for goods, merchan-  
dise and chattel sold by the Plaintiff to the Defendant on, to-  
wit, the 27th day of February, 1961; which sum of money with the  
interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant TWO HUNDRED FORTY-  
FOUR AND 48/100 (\$244.48) DOLLARS due from him on account stated  
between the Plaintiff and the Defendant on, to-wit, the 27th day  
of February, 1961; which sum of money with the interest thereon,  
is still unpaid.


  
E. G. RICKARBY, Attorney for  
Plaintiff.

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

FILED

SEP 13 1961

ALICE J. DUCK, CLERK  
REGISTER

  
E. G. RICKARBY, Attorney for  
Plaintiff.

COUNTY OF Mobile  
STATE OF Alabama

8G-188 (13743)

Be it remembered, that on this 5th day of September  
A. D., 1961, personally appeared before me, the undersigned authority,  
Jack Cocke known to me  
who being duly sworn, upon his oath stated that he is Owner  
of Walter Kidde Sales & Service  
{ a corporation organized and doing business under the laws of the State of  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of  
a sole trader doing business as Walter Kidde Sales & Service  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Walter Kidde Sales & Service; that the attached account against  
Augusta McCovery of Daphne, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Augusta McCovery  
at his special instance and request, that credit has been duly given for all payments and  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of Two hundred forty four & forty eight Dollars  
(\$244.48) with interest from 19 is justly due and  
remains unpaid.

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  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Jack Cocke  
Notary Public

County of Mobile State of Alabama  
My commission expires Mar 16



COUNTY OF Mobile  
STATE OF Alabama

SG-188 (13743)

Be it remembered, that on this 5th day of September  
A. D., 1961, personally appeared before me, the undersigned authority,  
Jack Coker  
who being duly sworn, upon his oath stated that he is Owner known to me  
of Walter Kidde Sales & Service  
{ a corporation organized and doing business under the laws of the State of  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of  
a sole trader doing business as Walter Kidde Sales & Service  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Walter Kidde Sales & Service; that the attached account against  
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is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Augusta McCovery  
at { ~~her~~ special instance and request, that credit has been duly given for all payments and  
his }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of Two hundred forty four & forty eight Dollars  
(\$244.48) with interest from 19 is justly due and  
remains unpaid.

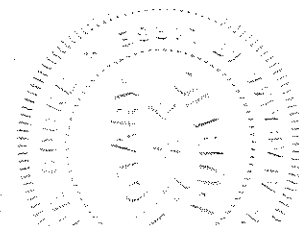
Jack Coker X

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  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Jane Coker

Notary Public

County of Mobile State of Alabama  
My commission expires Mar 15



Walter

idde Sales & Service of *Mobile Alabama*MOBILE HE 3-7836  
MOBILE HE 2-5875  
PENSACOLA HE 3-0778JACK COCKE  
OWNER

651 PILLANS STREET

August 16, 1961

Augusta McCovery  
Rt. 1 Box 277  
Daphne, Ala

| DATE                                  | INVOICE NUMBER | DEBIT    | CREDIT  | BALANCE  |
|---------------------------------------|----------------|----------|---------|----------|
| BALANCE BROUGHT FORWARD <del>25</del> |                |          |         |          |
| 2/27/61                               | M7293          | \$269.48 |         | \$269.48 |
| 4/10/61                               |                |          | \$25.00 | \$244.48 |
| STATEMENT                             |                |          |         |          |

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon AUGUSTA MCCOVERY

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 .....

AUGUST MCCOVERY

....., Defendant.....

by JACK COCKE, Ind. and d/b/a WALTER KIDDE SALES & SERVICE

....., Plaintiff.....

Witness my hand this 13 day of Sept 1961

Alice J. Duck, Clerk



No. 4868

Page \_\_\_\_\_

# STATE of ALABAMA

Baldwin County

## CIRCUIT COURT

JACK COCKE, Ind. & d/b/e  
WALTER KIDDE SALES & SERVICE,

Plaintiffs

vs.

AUGUSTA MCCOVERY

Defendants

### Summons and Complaint

Filed

**FILED**

19

SEP 13 1961

Clerk

*ALICE J. DUCK,*

CLERK  
REGISTER

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 1, Box 277, Daphne, Ala.

Received In Office

*Sept 13 1961*

*Taylor Wilkins*  
Sheriff.

I have executed this summons

this *Sept 20* 19 *61*

by leaving a copy with

*Augusta McConery*

claims

*54* miles at

per mile Total \$ *5.40*

TAYLOR WILKINS, Sheriff

BY

*Garner*  
DEPUTY SHERIFF

*Taylor Wilkins*

Sheriff.

*W. O. Garner*

Deputy Sheriff.

*Daphne*

Walter

MOBILE ME 3-7886  
MOBILE ME 3-5978  
PENSACOLA ME 3-0778

## Kiddle Sales &amp; Service of Mobile Alabama

JACK COCKE  
OWNER

651 PILLANS STREET

## HOUSE ORDER

Date Feb. 27 1961

No. M 7293

Sold To Augusta McCowery  
Rt. No. 1 - Box 277  
Daphne, AlaShip To: \_\_\_\_\_  
Daphne

| SALESMAN         |                    | NO. | AREA | CUSTOMERS SIGNATURE |          | CUSTOMERS PO |  | SHIP VIA     |  |
|------------------|--------------------|-----|------|---------------------|----------|--------------|--|--------------|--|
| Cocher           |                    |     |      |                     |          |              |  | Harris Smith |  |
| PART NO.         | DESCRIPTION        |     |      |                     | QUANTITY | UNIT PRICE   |  | TOTAL PRICE  |  |
| 10088            | NS N               |     |      |                     |          |              |  |              |  |
| <del>S156P</del> | Chem saw complete  |     |      |                     | 1        | 299.50       |  | 299.50       |  |
|                  |                    |     |      |                     |          |              |  |              |  |
|                  |                    |     |      |                     |          |              |  |              |  |
| S15RP            | Chem saw complete  |     |      |                     | 1        | 50.00        |  | 50.00        |  |
|                  | Credit on Trade in |     |      |                     |          |              |  |              |  |
|                  |                    |     |      |                     |          |              |  | 249.50       |  |
|                  |                    |     |      |                     |          |              |  |              |  |
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DATE PROMISED  
Feb 27, 1961CARRIER  
Harries Smith

ACCOUNTING COPY

FOB  
Daphne