

EDWARD I. PLOTTE CO.,  
a Corporation,

Plaintiff,

-vs-

ROBERT CULVER,

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 the sum of THREE HUNDRED FIFTY THREE & 98/100 (\$353.98) DOLLARS due from him for money on, to-wit, between the 1st day of July, 1960, and the 30th day of June, 1961, received by the Defendant to the use of the Plaintiff; which sum of money with the interest thereon is still unpaid.

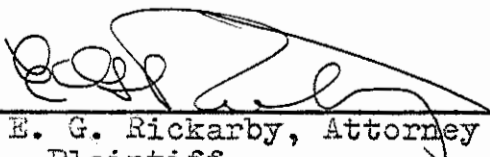
COUNT II

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FIFTY THREE & 98/100 (\$353.98) DOLLARS due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, between the 1st day of July, 1960, and the 30th day of June, 1961, which sum of money with the interest thereon is still unpaid.

  
E. G. Rickarby, Attorney for the  
Plaintiff

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

FILED  
OCT 5 1961  
ALICE J. DUCK, CLERK  
REGISTER

  
E. G. Rickarby, Attorney for the  
Plaintiff.

65      Verification for Statement of Account

COMMONWEALTH OF PENNSYLVANIA,  
COUNTY OF LACKAWANNA.

Before me, the undersigned notary public, personally appeared SANFORD COHEN, who being first duly sworn, deposes and says that he is Vice President of EDWARD I. PLOTTE CO., a corporation, the owner of the attached account and that the attached account is correct statement of account between EDWARD I. PLOTTE CO., and ROBERT CULVER, and that there is owing from the said ROBERT CULVER to the said EDWARD I. PLOTTE CO., the sum of THREE HUNDRED FIFTY THREE & 98/100 (\$353.98) DOLLARS, with interest from the \_\_\_\_\_ day of \_\_\_\_\_, 1961.

Sanford Cohen Vice Pres  
Sanford Cohen, Affiant

Subscribed and sworn to before me on this the 28 day of September, 1961.

Ruth Rader  
Notary Public, County of Lackawanna,  
Commonwealth of Pennsylvania.

RUTH RADER, Notary Public  
SCRANTON, LACKA. CO., PA.  
My Commission Expires Apr. 12, 1965

# B. B. CULVER ACCOUNT

July, 1960	Overcollection on deposit - Copeland Motors	\$ 2.75
Sept., 1960	Collected Plans Auto Sales Account	50.25
Oct., 1960	Commissions charged back on bad accounts:	
	Alexander Foreign Cars	51.25
	Alexander's Motorcar	7.50
	Ray Fairchild Cars	2.50
	Shelton Motor Sales	41.25
	Sports Marine, Inc.	59.00
	& Collection Fees - Plans Auto Sales	7.00
	Collected Big Tom Motors account	68.41
Nov., 1960	Overcollection on deposit - Copeland Motors	2.75
March, 1961	Correction in Commission - Rescued Motor Co.	5.00
April, 1961	Collected Sports Marine, Inc. account	59.00
	Collected Lewis Yager Tobacco	52.35
May, 1961	Commission Champion Auto Sales - account lost	15.00
June, 1961	Collected V. F. W. Club, Albemarle, Ala.	30.08
	Collected Mobile Lodge	52.55
		<u>\$477.70</u>

From this amount, we have deducted \$123.72 which represents commissions we have retained to apply against this balance.

\$477.70
- 123.72
<u>353.98</u> (Overdrawn)

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 Culver

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 Culver

, Defendant

by

Edward I. Plottle Co., a corporation

, Plaintiff

Witness my hand this

5<sup>th</sup>

day of

Oct

19 61

Ex-11-9-61

W. J. Alcock

Clerk

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

Edward I. Plottle Co.,  
a corporation

Plaintiffs

vs.

Robert Culver

Defendants

**SUMMONS and COMPLAINT**

Filed OCT 5 1961, 19

ALICE J. DUCK, CLERK  
REGISTER, Clerk

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

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

110 Blakeney Street  
Fairhope, Alabama

RECEIVED IN OFFICE

\_\_\_\_\_, 19

\_\_\_\_\_, Sheriff

I have executed this summons

this October 9, 19 61

by leaving a copy with

Robert Culver

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WIGGINS, Sheriff

BY Taylor Wiggins  
DEPUTY SHERIFF

Taylor Wiggins Sheriff

Bowers Deputy Sheriff

F. Hope

**E. G. RICKARBY**

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

September 22, 1961

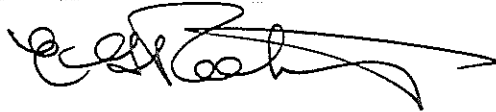
Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Edward I. Plottle Co.  
vs: Robert Culver  
Our File #

Enclosed find summons and complaint in the above mentioned cause, together with itemized and verified statement of account and our check in the sum of \$25.00 representing court costs. Please process, let us know when defendant has been served and oblige.

Yours very truly,



WR  
Encl.  
cc: Dup. Client  
10/9/61