

SOUTHERN RUBBER COMPANY, INC.,
an Alabama Corporation

Plaintiff

VS

MRS. VINNIE DOERING, d/b/a
DOERING TIRE & VULCANIZING
COMPANY

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4926

Comes now the Defendant in the above styled cause and for answer to
the Plaintiffs Complaint and each count thereof separately and severally
says:

1.

That the matters alleged therein are untrue.

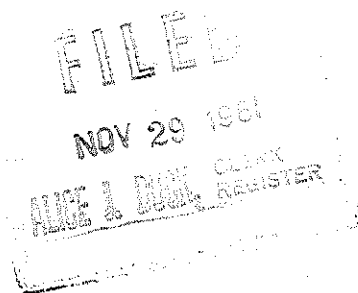
WILTERS, BRANTLEY & NESBIT

BY:

Harry J. Wilters
Attorneys for the Defendant

Defendant demands a trial by jury.

Harry J. Wilters
Att. for Defendant



Handwritten signature

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4926

SOUTHERN RUBBER COMPANY, INC.,
an Alabama Corporation

Plaintiff

VS

MRS. VINCIE DOERING, d/b/a
DOERING TIRE & VULCANIZING
COMPANY

Defendant

FORREST A. CHRISTIAN
Attorney for the Plaintiff
Foley, Alabama

FILED

NOV 22 1961

WILTERS, BRANTLEY & NESBIT
Attorneys for Defendant
Robertsdale, Alabama

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon MRS. VINCIE DOERING, doing business as DOERING TIRE & VOLCANIZING CO., 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, Alabama, at the place of holding same by SOUTHERN RUBBER COMPANY, INC., an Alabama corporation.

Witness my hand this the 30th day of October, 1961.

Est-11-1-61

Alice J. Black
Clerk

* * * * *

COMPLAINT

SOUTHERN RUBBER COMPANY, INC.,)
an Alabama corporation,

PLAINTIFF,

-VS-

MRS. VINCIE DOERING, d/b/a)
DOERING TIRE & VULCANIZING)
COMPANY,

DEFENDANT,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant THREE THOUSAND, FOUR HUNDRED TWENTY-ONE & 57/100 DOLLARS (\$3,421.57), due from her by account on, to wit: the 22nd day of September, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant THREE THOUSAND, FOUR HUNDRED TWENTY-ONE & 57/100 DOLLARS (\$3,421.57), due from her on account stated between the plaintiff and the defendant on, to wit: the 22nd day of September, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant THREE THOUSAND, FOUR HUNDRED TWENTY-ONE & 57/100 DOLLARS (\$3,421.57), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 22nd day of September, 1960, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 26th day of October, 1961.

The defendant's address is:

Robertsdale, Alabama

Jeff Blum
Attorney for Plaintiff

STATEMENT

SOUTHERN RUBBER COMPANY

INCORPORATED

GILLETTE TIRES, TUBES AND BATTERIES

PHONE 4-4651

917 SIXTH AVENUE, NORTH
BIRMINGHAM, ALABAMA

P. O. BOX - 2008

Doering Tire & Vulcanizing Co.,
 Robertsdale, Ala.

SALESMAN

DATE	CHARGES	TERMS	CREDITS	BALANCE
1-30-59	864 36			
2-18-59	139 08			
2-23-59	1,016 63			
4-20-59		Check	600 00	1,420 07
12- 7-59	1,051 95			
12-18-59	125 30			
12-23-59	107 19			
2- 9-60	852 03			
3-15-60	665 03			
3-15-60		Check	600 00	
9-22-60		Check	200 00	3,421 57

LAST AMOUNT IN THIS
 COLUMN IS BALANCE
 YOU OWE.



SOUTHERN RUBBER COMPANY, INC.

Phone 4-4651

WHOLESALERS

GILLETTE

Phone 4-4651

917 6th AVENUE, NORTH

TIRES, TUBES and BATTERIES

XBOOKKEEPINGX COPYX

BIRMINGHAM, ALA.

INVOICE

Sold To Doering Tire & Vulcanizing Co.

Street Address

City Robertsdale, Alabama

State

Date 1/30/59 105XX

Terms March 10

Order No.

Salesman McAdams

[illegible]

INVOICE #00008

Ship Via

Received By _____

NUMBER
XZ 2 4 X 2 X X X



SOUTHERN RUBBER COMPANY, INC.

Phone 4-4651

WHOLESALE

GILLETTE

Phone 4-4651

917 6th AVENUE, NORTH

TIRES, TUBES and BATTERIES

~~BOOKKEEPING COPY~~

BIRMINGHAM, ALA.

INVOICE

Sold To Doering Tire & Vulcanizing Co.

Date 2/16/59 x195x

Street Address _____
Robertsdale, Alabama

Terms March 10

City Robertsdale, Alabama

Order No. _____

State.

Salesman McAdams

[illegible]

Invoice	00606
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Ship Via

Received By _____

NUMBER
XZ 774X2X2



SOUTHERN RUBBER COMPANY, INC.

Phone 4-4651

WHOLESALE

GILLETTE

Phone 4-4651

917 6th AVENUE, NORTH

TIRES, TUBES and BATTERIES
BOOKKEEPING COPY

BOOKKEEPING COPY

BIRMINGHAM, ALA.

INVOICE

Sold To Doering Tire & Vulcanizing Co.

Date 2/23/59 K95XZ

Street Address _____ Robertsdale, Alabama

Terms Apr. 10, May 10, June 10

City _____ Robert Osuare, Alabama

Order No. _____

State _____

Salesman

[illegible]

Invoice #00865

Ship Via

Received By

NUMBER
X3242X4X

SOUTHERN RUBBER COMPANY, INC.

Phone 4-4651

WHOLESALERS

Phone 4-4651

GILLETTE

917 6th AVENUE, NORTH

TIRES, TUBES and BATTERIES

BIRMINGHAM, ALA.

BOOKKEEPING COPY

INVOICE

Doering Tire & Vulcanizing Co.		Date	12/7/59	195X
Sold To		Terms	Jan. 10	
Street Address		Order No.		
City		Salesman	Pritchett	
State				

[illegible]

INVOICE #13277

Ship Via

Received By

NUMBER ~~22~~ ~~7~~ ~~9~~ ~~5~~ ~~7~~



SOUTHERN RUBBER COMPANY, INC.

Phone 4-4651

WHOLESALE

GILLETTE

Phone 4-4651

917 6th AVENUE, NORTH

TIRES, TUBES and BATTERIES

BOOKKEEPING COPY X

BIRMINGHAM, ALA.

INVOICE

Sold To Doering Tire & Vulcanizing Co.

Date 12/18/59 x195

Street Address.

Terms Jan. 10

City Robertsdale, Ala.

Order No..

State

Salesman Pritchett

[illegible]

INVOICE #13748

Ship Via

Received By _____

NUMBER
32488Z

Phone 4-4651

TIRES, TUBES and BATTERIES

BOOKKEEPING COPY

BIRMINGHAM, ALA.

Sold To Doering Tire & Vulcanizing Co.

Date 2/9/61 1955

Street Address _____

Terms Mar. 10 - Apr. 10

City _____

Order No..

Salesman Pritchett

State.

[illegible]

Inv. 0100132 #1586

Ship Via

Received By

Moore Business Forms, Inc., Denton, Texas *

Phone 4-4651

TIRES, TUBES and BATTERIES

BIRMINGHAM, ALA.

917 6th AVENUE, NORTH

~~BOOKKEEPING COPY~~

Sold To Doering Tire & Vulcanizing Co.

Date 3/15/60 XIX5X

Street Address _____ Alabama _____

Terms April 10

City _____

Order No..

Salesman Pritchett

State.

[illegible]

INVOICE #17333

Ship Via

Received By

NUMBER
XZ 7489

STATE OF Alabama

COUNTY OF Jefferson

Before me, the undersigned authority in and for said County in
said State, personally appeared John C. Zirkelbach,
who having been by me first duly sworn, deposes and says that he is
Asst. Treasurer
of Southern Rubber Co., Inc.
the claimant, and that he has full and complete knowledge of the
account against Doering Tire & Vulcanizing Co.,
Robertsdale, Alabama
and that, \$ 3,421.57 the amount claimed, is justly due after
allowing all proper credits.

John C. Zirkelbach

Sworn to and subscribed

before me this the 26th

day of October 19 61

Gertrude B. Deitenbach

My Commission Expires January 22, 1962
Notary Public.

No. 4426

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SOUTHERN RUBBER COMPANY, INC.,
an Alabama Corporation,

PLAINTIFF

-VS-

MRS. VINCIE DOERING, d/b/a
DOERING TIRE & VULCANIZING
COMPANY,

DEFENDANT

Received 30 day of Oct 1961
and on 11 day of 1 1961
I served a copy of the within
or Mrs. Vincie Doering
By service on 1

TAYLOR WILKINS, Sheriff

By W. L. Wilkins D.S.

Sheriff claims 5.00 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. L. Wilkins DEPUTY SHERIFF

FILED
OCT 30 1961
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA