

WARREN D. CAUSE, JR.,

Plaintiff

VS

WILLIAM GWALTNEY, Individually
and d/b/a GWALTNEY'S SHEET
METAL SHOP,

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5704

Comes now the Defendant in the above styled cause and files the
following plea:

Not guilty.

1.

WILTERS, BRANTLEY & NESBIT

BY:

Thos. S. Nesbit
Attorneys for the Defendant

FILED

FEB 14 1964

ALICE A. DUCK, CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5704

WARREN D. GAUSE, JR.

Plaintiff

vs

WILLIAM GWALTNEY, Individually
and d/b/a GWALTNEY SHEET
METAL SHOP,

Defendant

WILTERS, BRANTLEY & NESBIT
Attorneys at Law
Robertsdale, Alabama

FILED

FEB 14 1964

ALICE I. DICK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5704

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon William Gwaltney, Ind. & d/b/a Gwaltney's Sheet Metal

Shop,

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

William Gwaltney, Ind. & d/b/a Gwaltney's Sheet Metal Shop Defendant

by Warren D. Gause, Jr.

Plaintiff

Witness my hand this 11th day of September 19 63

84-9-27-63

Alice J. Duck, Clerk

WARREN D. GAUSE, JR.,

Plaintiff,

vs.

WILLIAM GWALTNEY, Individually
and doing business as Gwaltney's
Sheet Metal Shop,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5704

The Plaintiff claims of the Defendant One Hundred Fifty Dollars (\$150.00) as damages for that, on heretofore, to-wit: September 12, 1962, the Defendant, acting by and through his agents, servants or employees, who were then and there acting within the line and scope of their employment as such, negligently damaged the home of the Plaintiff situated in Stockton, Baldwin County, Alabama, in this: the Defendant was employed by the Plaintiff to insulate certain duct work in the basement of said home of the Plaintiff for which the Plaintiff agreed to pay the Defendant a reasonable sum of money and the Defendant, acting by and through his agents, servants or employees, who were then and there acting within the line and scope of their employment as such, in performing said work or service, used a flammable glue or other substance which was caused to be ignited by the hot water heater located in the basement of the Plaintiff's home and as a result of such ignition and of said negligence, the home of the Plaintiff was subjected to fire and smoke damage in the amount of \$150.00. And the Plaintiff alleges that all of his damages were the proximate result of the negligence of the Defendant, acting by and through his agents, servants or employees, who were then and there acting within the line and scope of their employment as such, wherefore the Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

FILED

SEP 11 1963

ALICE J. DUCK, CLERK
REGISTER

By:

Attorneys for Plaintiff

Received 12 day of Sept 1963
and on 27 day of Sept 1963
I served a copy of the within S & C
on William Gwaltney
By service on _____

TAYLOR WILKINS, Sheriff

By H. F. Hall D. S.

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

5704

WARREN D. GAUSE, JR.,

Plaintiff,

vs.

WILLIAM GWALTNEY, Individual-
ly and doing business as
Gwaltney's Sheet Metal
Shop,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

FILED

SEP 11 1963

ALICE A. DUCK, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW

BAY MINETTE, ALABAMA

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

P. O. BOX 71

September 10, 1963

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

Dear Mrs. Duck:

Re: The Pure Oil Company
Vs: Noah A. Waldrop
Our File: 63-193

5705

Enclosed find summons and complaint, together with
itemized and verified statement of account, along
with deposit for costs in the sum of \$25.00.

Please process, hand it to the sheriff for service,
and oblige.

Yours very truly,



ts
Encl.
10/10/63
cc: Petroleum Col. Agency

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

November 5, 1963

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

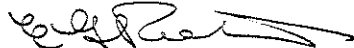
Dear Mrs. Duck:

Inre: The Pure Oil Company
Vs: Noah A. Waldrop
Case No. 5705
Our File: 63-193

Request you enter up a judgment by default in the above styled case, being \$169.37 principal, plus \$4.07 interest, making a total of \$173.44, on an itemized and verified statement of account.

Would you also take this certificate down to the Probate Court and have it recorded for me and the costs charged to my account, and oblige.

Yours very truly,



EGR/ms
Dup: Petroleum Collection Agency
11-18-25

CIRCUIT COURT, BALDWIN COUNTY,
CASE NO. _____
_____, 1963.

TERM, 1963.

Witness my hand this 11 day of Sept, 1963.

Clerk.

AT LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-NINE AND 37/100 (\$169.37) DOLLARS, due from him by account on, to-wit, the 30th day of April, 1963; which sum of money with interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement of account, filed herewith.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-NINE AND 37/100 (\$169.37) DOLLARS, due from him for merchandise, goods and chattels, sold by the Plaintiff to the Defendant between the 31st day of December, 1961, and the 30th day of April, 1963; which sum of money with the interest thereon is still unpaid.

125

Count III.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-NINE AND 37/100 (\$169.37) DOLLARS, due from him on account stated on, to-wit, the 30th day of April, 1963; which sum of money with interest thereon is still unpaid.


E. G. RICKARBY, Attorney for Plaintiff.

EX-10-2-63

FILED
SEP 11 1963
ALICE L. DUCK, CLERK
REGISTER

70,5705

The Pure Oil Co
a corp

05

Noah A. Waldrop

Received 11/16 day of Sept 1963
on 21st day of Oct 1963
served a copy of the within S + C
Noah A. Waldrop

Service on Noah A. Waldrop
TAYLOR WILKINS, Sheriff
By Fred Seibert D. S.
Daphne, Ala.

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Fred Seibert
DEPUTY SHERIFF

FILED

11 1963

STATEMENT

THE PURE OIL COMPANY

Noah A. Waldrop

Daphne, Alabama

Service Station Account

DATE	ITEM	CHARGES	CREDITS	BALANCE
12-31-61	Petroleum Products	43.04		
1-31-62	" "	75.85		
2-28-62	" "	29.65		
3-31-62	" "	23.05		
4-30-62	" "	3.00		
10-19-62	Payment		25.00	
12-28-62	Petroleum Products	12.40		
2-28-63	Service Charge	2.42		
3-29-63	" "	2.46		
4-30-63	" "	2.50		169.37

STATE OF OHIO)
COUNTY OF FRANKLIN) SS

T. V. Pickens personally appeared before the undersigned Notary Public, who deposes and says on oath that he is Attorney of The Pure Oil Company, an Ohio Corporation, and that the above account is just, true, due and unpaid, and that no part of same has been paid by offset, discount or otherwise, except as shown on the statement.

THE PURE OIL COMPANY

Subscribed and sworn to before me
this 6th day of September, 1963.

Attorney

H. F. BELL

Notary Public, Franklin County, Ohio

My Commission Expires May 21, 1967