

COMPLAINT

DONALD V. GAAR, JR., INDIVIDUALLY, )  
AND D/B/A FOLEY AUTO PARTS )  
PLAINTIFF )

VS

DOUGLAS WHITE,

DEFENDANT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

No. 5931

I.

The plaintiff claims of the defendant the sum of One Hundred Thirty Four and 60/100(\$134.60)Dollars, due from him by account, to-wit: the 24th day of March, 1962, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiff claims of the defendant One Hundred Thirty Four and 60/100(\$134.60) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 24th day of March, 1962, which sum of money, with interest thereon, is still unpaid.

*James A. Quinn*  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Donald V. Gaar, Jr., a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 24th day of March, 1962, and due at present.

The defendant lives at Summerdale, Alabama.

FILED

FEB 17 1964

ALICE I. DICK, CLERK  
REGISTER

AFFIDAVIT

STATE OF ALABAMA )

BALDWIN COUNTY

Before me, James W. Burns a Notary Public in and  
for said County and State, personally appeared Donald Gaar

\_\_\_\_\_, who being by me first duly sworn, deposes and says: that  
he is the owner of Foley Auto Parts \_\_\_\_\_;

that the annexed statement of account of the said Foley Auto Parts  
, against Douglas White.

\_\_\_\_\_, is just, true and correct; that there is now due on said account One Hundred Thirty Four and 60/100 (\$134.60) after deducting all credits, set/offs or counterclaims.

Donald V. Hear Jr.

Sworn and subscribed before me on this the

13 day of February, 1964.

Notary Public, Baldwin County, Alabama



Jaley Auto Parts

Copy  
Invoice

"Your NAPA Jobber is a Good Man to Know"

Sold To Dauglas White

Address Summersdale, Ala.

Cust's  
Order No.

Date 10-16 1963

SALESMAN

CASH CR.

CHG. CR.

CASH

CHG.

PD. ON ACCT.

DIST.

QUANTITY

STOCK No.

DESCRIPTION

CREDIT  
EACH

EXTENSION

CHG  
TOTAL

3-19-62

Invoice 9699

25.42

3-19-62

" 9709

31.60

3-23-62

" 9738 CREDIT 20.00

3-24-62

" 9753

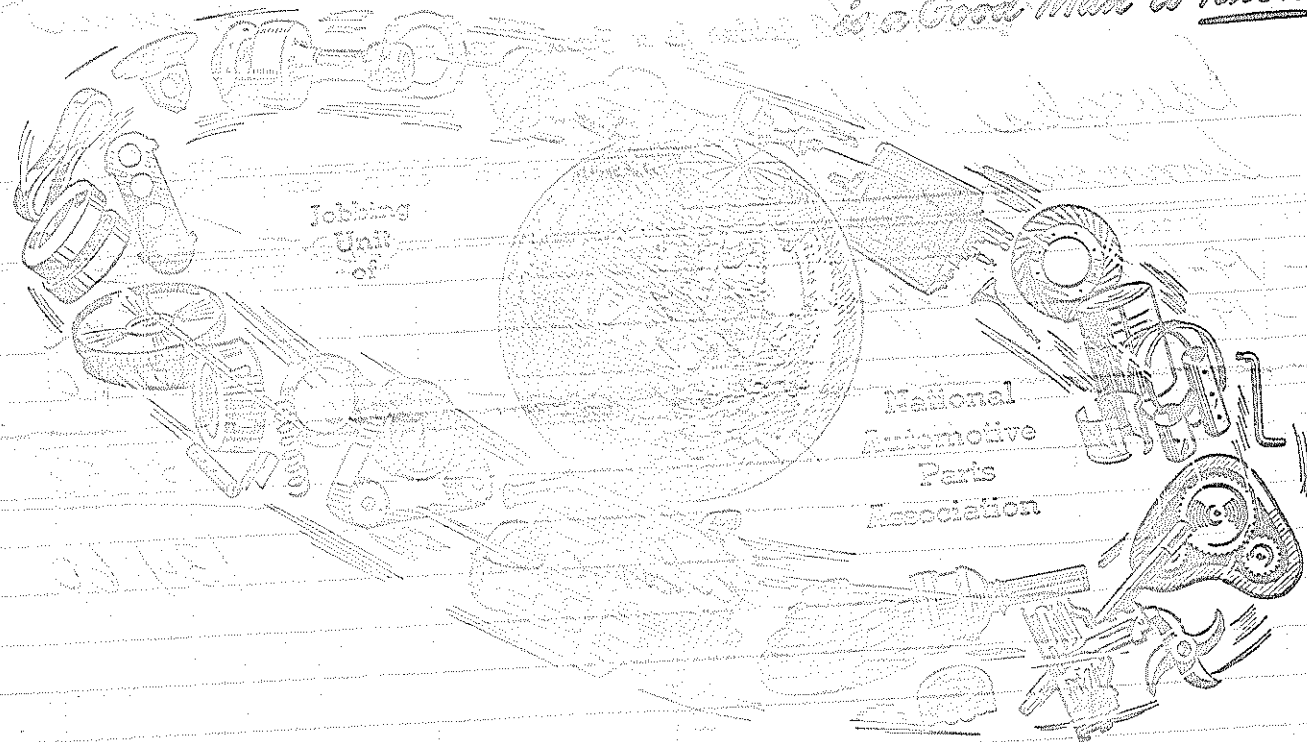
37.58

Balance

134.60

1

Here *MAPA* Jotter  
is a Good Man to Know!



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 Douglas White

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 \_\_\_\_\_

Douglas White, Defendant.

by Donald V. Gaar, Jr., individually and d/b/a Foley Auto Parts

\_\_\_\_\_, Plaintiff.

Witness my hand this 17 day of Feb 1944

W. J. Smith, Clerk

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Donald V. Gaar, Jr., individually,

and d/b/a Foley Auto Parts  
Plaintiffs

vs.

Douglas White

Defendants

**Summons and Complaint**

**FILED**

Filed Feb 17 1964 1964

AUGIE J. DUCK, CLERK REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Summerdale, Alabama

Received In Office

2/17, 1964  
Taylor Wilkins  
Sheriff.

I have executed this summons  
this 18th Feb 1964  
by leaving a copy with

Douglas White

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY Eastburn  
DEPUTY SHERIFF

Taylor Wilkins Sheriff.  
Jim Eastburn Deputy Sheriff.  
S'dale