

December 31, 1964

Hon. James A. Brice  
Box 202  
Atmore, Alabama

5975

Dear Sir:

Re: Garrett-Swoboda Equipment  
Company, Inc., a Corp.  
vs: Raymond Merchant.

The Judge has returned the docket sheet and file in the above style cause and says he will sign your Judgment if you will take a copy of the Complaint to the Sheriff and let him execute it the date same was served. Then you may come in and prove your case and he will enter your Judgment by Default.

All good wishes for a happy and successful year.

Yours very truly,

---

Circuit Clerk.

AJD/eb

COPY

JAMES A. BRICE

ATTORNEY AT LAW

BOX 292 • FOLEY, ALABAMA • WH3-3601

MESSAGE

REPLY

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

DATE

TE March 10, 1964

Enclosure--Summons and Complaint  
re: Garrett-Swoboda Equipment Co., Inc.  
vs: Raymond Merchant

SIGNED

*Mr. 5-9-75*

RECIPIENT KEEP THIS COPY; RETURN WHITE COPY TO SENDER

JAMES A. BRICE

ATTORNEY AT LAW

BOX 295 • FOLEY, ALABAMA • 36535

202, Atmore,

M E S S A G E

R E P L Y

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

DATE

Re: Garrett Swoboda Equipment Co., Inc.  
Vs: Raymond Merchant, At Law no. 5957

DATE 11-25-64

5975

Dear Mrs. Duck:

Mr. Raymond Merchant, the defendant, is working and living in the Summerdale area, according to my information.

I would appreciate your returning the summons and complaint to the sheriff for service of process in line with the above information.

Re: Foley Building Supply Company  
Vs: Cary Bullard, At Law no. 5741

I have recently learned that the defendant in the above styled cause is currently employed by South Baldwin Hospital, Foley, Alabama.

It will be appreciated if you would return the file to the sheriff for service on the defendant on accordance with this information.

Thank you.

Sincerely,

JAB/pr

SIGNED

RECIPIENT KEEP THIS COPY. RETURN WHITE COPY TO SENDER

COMPLAINT

GARRET-SWOBODA EQUIPMENT COMPANY, INC., )

a corporation,

PLAINTIFF

VS

RAYMOND MERCHANT

DEFENDANT )

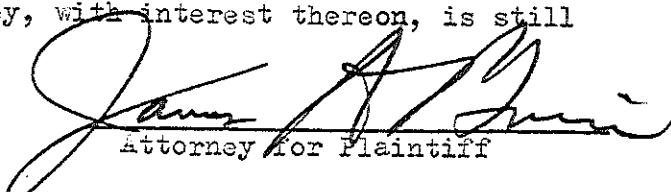
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

I

The plaintiff claims of the defendant the sum of One Hundred Nine and 69/100(\$109.69)Dollars, due from him by account, to-wit: the 15th day of December, 1959, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant One Hundred Nine and 69/100 (\$109.69)Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 15th day of December, 1959, which sum of money, with interest thereon, is still unpaid.

  
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by L.E. Garret, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 15th day of December, 1959, and due at present.

The defendant resides at Summerdale, Alabama.

FILED

MAR 13 1960

ALICE J. DICK, CLERK  
REGISTER

AFFIDAVIT

STATE OF ALABAMA )

BALDWIN COUNTY

EDWARD G. STURMA

Before me, \_\_\_\_\_, a Notary Public in and for said County and State, personally appeared L E Garrett

\_\_\_\_\_, who being by me first duly sworn, deposes and says: that

He is the president of Garrett-Swoboda Equipment Co Inc; that the annexed statement of account of the said Garrett-Swoboda Equipment Co Inc., against Raymond Merchant

\_\_\_\_\_, is just, true and correct; that there is now due on said account One Hundred Nine and 69/100 Dollars after deducting all credits, set/offs or counterclaims.

L E Garrett

Sworn and subscribed before me on this the

23<sup>rd</sup> day of January, 1964.

Edward G. Sturma  
Notary Public, Baldwin County, Alabama

710

STATEMENT

# GARRETT-SWOBODA EQUIPMENT CO., INC.

## ROBERTSDALE, ALABAMA



SYMBOL OF SERVICE

ROBERTSDALE, ALA., \_\_\_\_\_

1-22 1964

Raymond Merchant  
Summersdale, Ala

TERMS: NET CASH END OF MONTH

DATE		CHARGES	CREDITS	BALANCE
1959				
12 15	Balance			109 69

All parts and repair labor; if charged must be paid on or before the 10th of the following month. The only exception to this rule will be individual financing, accompanied by bankable note. All accounts not paid in full by cash or bankable note will automatically go on a C.O.D. basis.

QUALITY — SERVICE — SATISFACTION

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 Raymond Merchant

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 Raymond Merchant  
....., Defendant.....

by Garrett-Svoboda Equipment Co., Inc., a corporation  
....., Plaintiff.....

Witness my hand this 13 day of March 1964

Beijing Aluck, Clerk

64-23-31-65

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Garrett-Swoboda Equipment Co.,  
Inc., a corporation

Plaintiffs

vs.

Raymond Merchant

*Summerdale 600 Ala.*

Defendants

**Summons and Complaint**

Filed \_\_\_\_\_ 19\_\_\_\_

**FILED**

MAR 18 1964

Clerk

ALICE J. DUCK, CLERK REGISTERED

*Ret. Not found  
Subject in Coco 1  
4-4-64*

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Summerdale, Alabama

Received In Office

*6/17/64*, 1964

Sheriff claims 60 miles at

Ten-Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY *[Signature]* DEPUTY SHERIFF

this \_\_\_\_\_ 1964

by leaving a copy with

*Raymond Merchant*

*3-31-64*

*12-26-64*  
~~SEARCHED~~  
~~SERIALIZED~~  
~~INDEXED~~  
~~FILED~~  
*[Signature]* Sheriff

Sheriff claims 60 miles at

Ten-Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY *[Signature]* DEPUTY SHERIFF

*Taylor Wilkins* Sheriff.

*[Signature]* Deputy Sheriff.  
*Summerdale, Ala.*