

COMPLAINT

GARRETT-SWOBODA EQUIPMENT CO., INC.,)
a corporation)

Plaintiff)

VS)

JOHNNY LONGMIRE)

Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

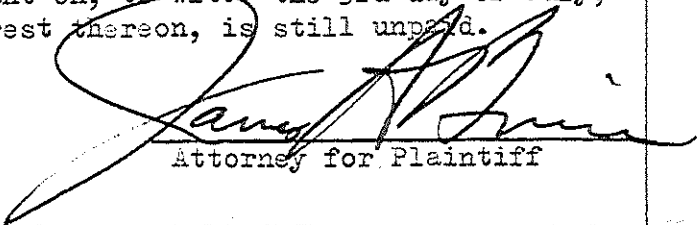
70.6032

I

The plaintiff claims of the defendant the sum of Two Hundred Forty Five and 93/100(\$245.93)Dollars, due from him by account, to-wit: the 3rd day of July, 1962, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant Two Hundred Forty Five and 93/100(\$245.93)Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 3rd day of July, 1962, 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. Garrett, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 3rd day of July, 1962, and due at present.

The defendant lives at Daphne, Alabama

FILED

APR 21 1964

ALICE J. DUCK, CLERK
REGISTER

STATEMENT

GARRETT-SWOBODA EQUIPMENT CO., INC.

ROBERTSDALE, ALABAMA



SYMBOL OF SERVICE

ROBERTSDALE, ALA.,

1-22 1964

Johnny Longmire

Rt 1 Box 145 Daphne, Ala

TERMS: NET CASH END OF MONTH

DATE			CHARGES	CREDITS	BALANCE
1960					
10 28	Parts	5936	498		
11-38	✓	1731	2694		
10	✓	9238	703		
4 11	Repair Order	9392	11691		
11	✓ ✓	9373	2873		
30	✓ ✓	9339	16764		
30	Check on acct			31228	
5 4	Parts	2850	552		
8 10	✓	63	359		
10	Repair Order	117	21313		
12	✓ ✓	81	1015		
10 7	Check on acct			2500	
11 1	Equip	1459	6224		
12 3 5	Check on acct			10000	
31	Check on acct			3000	
4 14	Equip	4067	5750		23698

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

GARRETT-SWOBODA EQUIPMENT CO., INC.

ROBERTSDALE, ALA.,

1-22

1964

Johnny Longmire
Daphne

[illegible]

QUALITY — SERVICE — SATISFACTION

AFFIDAVIT

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, Edward G. Swann, a Notary Public in and
for said County and State, personally appeared L E Barrett

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

He is the president of Barrett-Swaboda Equipment Co Inc;
that the annexed statement of account of the said Barrett-Swaboda
Equipment Co Inc., against Johnny Longmire

_____, is just, true and correct; that there is now due on said
account Two Hundred Forty Five and 93/100 Dollars after
deducting all credits, set/offs or counterclaims.

L E Barrett

Sworn and subscribed before me on this the

23RD

day of

January

, 196

4.

Edward G. Swann
Notary Public, Baldwin County, Alabama

MY COMMISSION EXPIRES JULY 8, 1967

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 Johnny Longmire

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 Johnny Longmire

-----, Defendant-----

by Garrett-Swoboda Equipment Company, Inc., a corporation

-----, Plaintiff-----

Witness my hand this 21 day of April 1964

David J. Duke, Clerk

E4-4-29-64

No. 6032

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Garrett-Swoboda Equipment Co.,

Inc., a corporation

Plaintiffs/

vs.

Johnny Longmire

Defendants

Summons and Complaint

Filed

FILED

19

APR 21 1964

ALICE J. DUCK

**CLERK
REGISTER**

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

4/22, 1964

Sheriff.

I have executed this summons

this 29th of April 1964

by leaving a copy with

Johnny Longmire

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY

Deputy Sheriff
DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.

JAMES A. BRICE

ATTORNEY AT LAW

BOX 298 • FOLEY, ALABAMA • WH3-3601

MESSAGE

REPLY

TO

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

DATE

April 20, 1964

Enclosure--re: Garrett-Svoboda
vs: Johnny Longmire

Summons and Complaint

DATE

SIGNED

RECIPIENT KEEP THIS COPY. RETURN WHITE COPY TO SENDER