

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

March 11, 1963

5506

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

Dear Mrs. Duck:

Re: Pennsylvania Tire Acceptance Corporation
Vs: Joe Odom, Jr.
Our File: 62-49

Enclosed find summons and complaint in the above
styled cause, together with check in the sum of
\$25.00 representing court costs. Please process
and oblige.

Yours very truly,



wrt
encl.
cc: (dup.) Client
cc: Mr. Joe Odom, Jr.
3/25/63

PENNSYLVANIA TIRE ACCEPTANCE
CORPORATION, A Corporation,

Plaintiff,

VS.

JOE ODOM, JR.,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.


CASE NO. _____.

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY-FIVE AND 70/100 (\$185.70) DOLLARS, due by promissory note made by Defendant to Independent Tire Co., Inc., on, to-wit, the 30th day of October, 1961, and payable ONE HUNDRED FOUR AND 66/100 (\$104.66) DOLLARS on December 10, 1961, ONE HUNDRED FOUR AND 66/100 (\$104.66) DOLLARS on January 10, 1962, and ONE HUNDRED FOUR AND 68/100 (\$104.68) DOLLARS on February 10, 1962, with interest thereon since February 10, 1962, and which note is the property of the Plaintiff.

Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal property as exempt to him under the Constitution and laws of the State of Alabama and agreed to pay an attorney's fee for the collection thereof and the Plaintiff hereby claims the further sum of THIRTY FIVE DOLLARS (\$35.00) as such attorney's fee.



E. G. Rickarby, Attorney for Plaintiff.

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 JOE ODOM, JR.

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 JOE ODOM, JR.,

-----, Defendant.-----

by PENNSYLVANIA TIRE ACCEPTANCE CORPORATION, A Corporation,

-----, Plaintiff.-----

Witness my hand this 14 day of March 1963

Exp-3-20-63

Alfred J. Smith, Clerk

No. 5506

Page _____

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**

PENNSYLVANIA TIRE ACCEPTANCE

CORPORATION, A Corporation,

Plaintiffs

vs.

JOE ODOM, JR.,

Defendants

Summons and Complaint

Filed

MAR 14 1963

19

Clerk

E. G. Rickarby
Attorney at Law
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Mr. W. T. Walley at Walley's
Store, Belforest Road, can tell
you where to find him.

Received In Office

March 14, 1963

Sheriff.

I have executed this summons

this

20th day of Mar 1963

by leaving a copy with

Joe Odom, Jr.

Sheriff claims

70

miles at

Ten Cents per mile Total \$ 7.00.

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.

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

April 23, 1963

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

Dear Mrs. Duck:

Re: Pennsylvania Tire Acceptance Corporation
Vs: Joe Odom, Jr.
Case No. 5506

Request a judgment by default be entered against the defendant in the above styled cause on suit filed in your Court, being a principal sum of \$185.70, plus costs and interest.

Please, also, send this judgment certificate down to the Probate Court for recording, and oblige.

Yours very truly,



ts

5/23/63

cc: American Bureau of Coll. Inc.

LAW OFFICES
RICKARBY & BENTON

ATTORNEYS AT LAW
35 SOUTH SECTION STREET
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

E. G. RICKARBY
DANIEL A. BENTON

TELEPHONE
(205) 928-2308

February 22, 1971

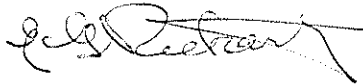
Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama

Re: Pennsylvania Tire Acceptance
Corporation
v. Joe Odom, Jr.
Case No. 5506

Dear Mrs. Blackmon:

This judgment has been paid off. Please recall execution and mark set aside. Paid: \$25.00 cost.

Yours very truly,



E. G. Rickarby

EGR:w
~~Ene.~~