

LAW OFFICES

MAILING ADDRESS  
P. O. BOX 271

E. G. RICKARBY  
35 SOUTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

September 14, 1965

Honorable Telfair J. Mashburn  
Circuit Judge  
Bay Minette, Alabama

Dear Judge Mashburn:

Inre: Merco-Division of Vester J. Thompson, Jr.,  
a Corporation,  
Vs: William L. Scheaffer  
Circuit Court Jury Case No. 6178  
Our File: 63-325

Request Judgment by Consent for the amount sued for, plus interest  
being \$400.00 principal, interest from July 20th, 1962, \$72.00,  
total \$472.00, by consent on an itemized statement in accordance  
with letter hereto attached.

Yours very truly,



EGR/jlb  
Encl.  
cc: Mr. John V. Duck  
cc: Client.  
9-24-65

RECEIVED  
SEP 15 1965  
ALICE I. WALKER, CLERK  
REGISTER

JOHN V. DUCK

ATTORNEY AT LAW

FAIRHOPE, ALABAMA

September 13, 1965

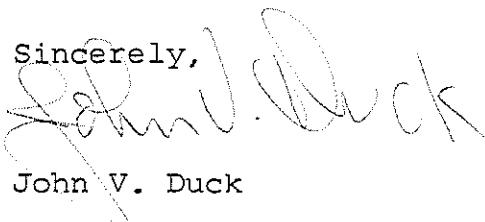
Honorable E. G. Rickarby  
Attorney at Law  
Fairhope, Alabama

Re: Merco vs. Schaeffer

Dear Mr. Rickarby:

This letter will give you authority to have the  
Judge enter a Consent Judgment in the above styled  
cause.

Sincerely,



John V. Duck

JVD:lh

FILED  
SEP 13 1965  
AUG 1 1964  
CLERK  
RECORDS

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,  
NO. \_\_\_\_\_  
TERM, 1964.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon WILLIAM L. SCHEAFFER,  
Individually, and doing business as SCHEAFFER WELL COMPANY,  
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 L. SCHEAFFER, Individually,  
and doing business as SCHEAFFER WELL COMPANY, Defendant,  
by MERCOC - DIVISION OF VESTER J. THOMPSON, JR., a Corporation,  
Plaintiff.

WITNESS my hand this 3 day of Sept, 1964.

Alvin J. French Clerk.

MERCO-Division of Vester J. Thompson, Jr., a corporation,  
Plaintiff,  
VS  
WILLIAM L. SCHEAFFER, Individually, and doing business as SCHEAFFER WELL COMPANY,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

*MO 4178*

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant FOUR HUNDRED (\$400.00) DOLLARS due from him by account, on, to-wit, the 20<sup>th</sup> day of July, 1962, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED (\$400.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 13<sup>th</sup> day of February, 1963; which sum of money with the interest thereon is still unpaid.

Cont'd, Summons & Complaint:  
MERCO-Division vs Scheaffer Well.

Count III.

The Plaintiff claims of the Defendant the sum of  
FOUR HUNDRED (\$400.00) DOLLARS due from him for merchandise,  
goods and chattels sold by the Plaintiff to the Defendant  
between the 3rd day of July, 1962 and the 20th day of  
July, 1963, which sum of money with the interest thereon  
is still unpaid.

  
\_\_\_\_\_  
E. G. RICKABY, Attorney for  
Plaintiff.

Ex. 9-26-64

VERIFICATION FOR ITEMIZED STATEMENT OF ACCOUNT

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, in and for said county, in said state, personally appeared Vester J. Thompson, Jr., who being first duly sworn, deposes and says that he is President for MERC0-Division of Vester J. Thompson Jr., Inc., who is a Corporation.

That as such President, affiant has knowledge of the account owed to MERC0-Division of Vester J. Thompson Jr., Inc., by Scheaffer Well Company, who is an individual, William L. Scheaffer.

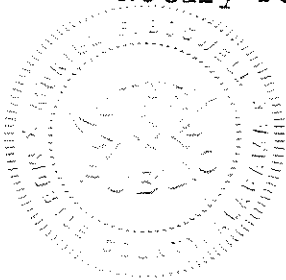
That the attached itemized statement is a true and correct statement of the account owed by Scheaffer Well Company to MERC0-Division of Vester J. Thompson Jr., Inc.,

~~That there is now owing by Scheaffer Well Company~~ to MERC0-Division of Vester J. Thompson Jr., Inc. in the sum of FOUR HUNDRED (\$400.00) DOLLARS, with interest from 20 July, 1963, after allowing all credits.

*Vester J. Thompson Jr.*  
Affiant

Subscribed and sworn to before me this the 27th day of August, 1964.

*Muriel G. Boswell*  
Notary Public. Mobile County, Alabama



FILED

SEP 8 1964

W. L. SCHEAFFER  
W. L. SCHEAFFER

STATEMENT

TELEPHONE HE 2-6746  
P. O. BOX 4175

**MECHANICAL EQUIPMENT COMPANY**

750 SAVANNAH STREET

MOBILE, ALABAMA

Scheaffer Well Company  
Belfrost Road  
Fairhope, Alabama

---

Invoice No. 3057 dated 7-3-62	\$360.78
Invoice No. 3143 dated 7-20-62	65.73
	<u>\$426.51</u>
Paid on 2-13-63	10.00
Paid on 6-29-63	16.51
	<u>\$400.00</u>

CUSTOMER INVOICE

**MERCO**

MECHANICAL EQUIPMENT AND RUBBER COMPANY

DIVISION OF VESTER J. THOMPSON JR., INC.

CREDIT APPROVED

If It's Pumps, Sprayers or Sprinklers      If It's Made of Rubber      We Sell It

P. O. BOX 4178  
MOBILE, ALABAMA

PHONE HE 2-6746  
750 SAVANNAH STREET

DATE 7-3-62

ORDERED BY: \_\_\_\_\_ ORDER NO: \_\_\_\_\_

INVOICE NO. 3057

SOLD TO: Scheaffer Well Co.  
Prichard, Ala.

SHIP TO: \_\_\_\_\_

SPECIAL INSTRUCTIONS

REMARKS:

QUAN.	DESCRIPTION	UNIT	PRICE	WT/FT	AMOUNT
2	2" x 4' Stainless Steel Screens	32	00	ea	64 00
2	2" x 4' 60 mesh OE brass screens	16	85	ea	33 70
1	2" x 4' 60 mesh drive point brass	17	35	ea	17 35
210'	20 lgt. 2" galv. T+C pipe	49	64	c	208 49
32	2" pipe couplings		73	ea	23 36
					<u>\$ 346 90</u>
				<u>tax</u>	<u>13 88</u>
					<u>\$ 360 78</u>

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL.

REC'D BY \_\_\_\_\_

CUSTOMER INVOICE

**MERCO**

MECHANICAL EQUIPMENT AND RUBBER COMPANY

DIVISION OF VESTER J. THOMPSON JR., INC.

CREDIT APPROVED

*If It's Pumps, Sprayers or Sprinklers*     *If It's Made of Rubber*     *We Sell It*

P. O. BOX 4175  
MOBILE, ALABAMA

PHONE HE 2-6746  
780 SAVANNAH STREET

SPECIAL INSTRUCTIONS

DATE 7-20-62

ORDERED BY: \_\_\_\_\_ ORDER NO: \_\_\_\_\_

INVOICE NO. 3143

SOLD TO: Recherer Weel Co.

SHIP TO: \_\_\_\_\_

Dainger, Ala.

REMARKS:

QUAN.	DESCRIPTION	UNIT	PRICE	WT/FT	AMOUNT
<u>200</u>	<u>2" x 48" x 60 SS Weel screens</u>	<u>EA</u>	<u>60</u>	<u>EA</u>	<u>63.20</u>
			<u>Subt</u>		<u>25.3</u>
					<del><u>88.5</u></del>
					<u>\$ 65.73</u>

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS BILL.

REC'D BY: \_\_\_\_\_



M. 6178

Mercer Division of  
District of Thompson  
a corp

05

William L. Shafer  
Co Rd. 27

Received

3<sup>rd</sup> day of

Sept 1964

and on 26

day of Sept

1964

I served a copy of this writ

on

William L. Shafer

By service on

William L. Shafer

TAYLOR WILKINS, Sheriff

By Roy Randall, D.S.

Franklyn'saler.

70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
DEPUTY SHERIFF

FILED

SEP 3 1964

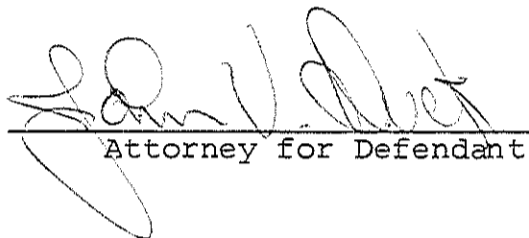
ALICE I. DUCK, CLERK REGISTER

MERCO-Division of Vester J. Thompson, Jr., a corporation,  
Plaintiff,  
vs.  
WILLIAM L. SCHEAFFER, Individually, and doing business as SCHEAFFER WELL COMPANY,  
Defendant.

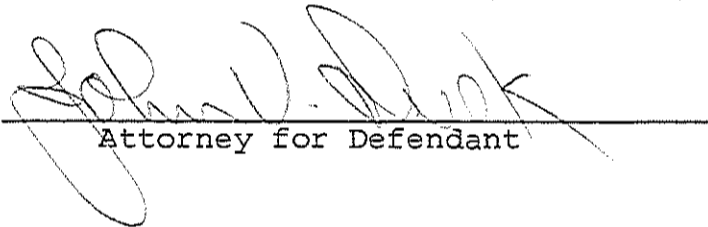
) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW  
)  
)  
)  
)

COMES NOW the Defendant in the above styled cause, and for answer to the Bill of Complaint filed herein says:

That as to Count I "Not Guilty". As to Count II "Not Guilty". As to Count III "Not Guilty".

  
\_\_\_\_\_  
Attorney for Defendant

The Defendant respectfully demands a trial by Jury.

  
\_\_\_\_\_  
Attorney for Defendant

F.I. LIND  
OCT 16 1964  
ALICE L. DUCK