

RIPCO, INC.,)
Plaintiff,)
vs.)
W. L. PATTON,)
Defendant.)

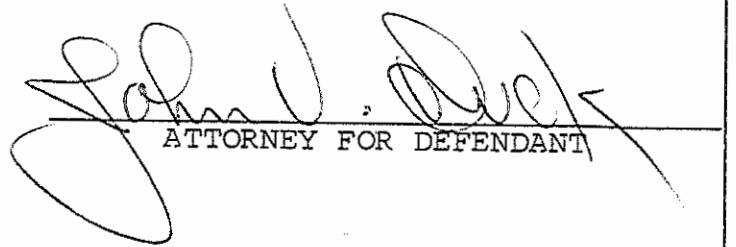
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6/55

Comes now the Defendant in the above styled cause and demurs to the Bill of Complaint filed herein and for grounds thereof says:

1. That said Bill of Complaint does not state a cause of action.
2. From aught that appears, the itemized account attached to the Bill of Complaint is incorrect on its face.


ATTORNEY FOR DEFENDANT

FILED
APR 30 1955
AUG 1 1955
CLERK
REGISTER

8-4,4-6-65

STATE OF PENNSYLVANIA
COUNTY OF CHESTER

33.

AFFIDAVIT OF CLAIM

BEFORE ME, the subscriber, a person authorized to take acknowledgements, in and for the County, and State aforesaid,
personally appeared Charles R. Busby, who being
(name of person making affidavit)

by me first duly sworn, on oath, states that he is:

Use only when
Claimant is a
corporation

President

(title of officer or agent)

of Ripco, Inc.

(name of corp.)

a corporation incorporated under the laws of the state of Delaware

One of the firm of

(full name of firm)

Use only when
Claimant is a
co-partnership

consisting of himself and

(full names of all other partners)

Use only when
one person owns
business

A Sole Trader doing business as

(business name, if any; otherwise own name)

that he has knowledge of the facts herein set forth and is duly authorized to make this affidavit; that the statement of the account of
Ripco, Inc., hereinafter called Claimant, against W.L. Patton,

hereinafter called Debtor, attached hereto and made part of this affidavit, is, within the knowledge
or affiant, just, true and correct; that the goods, services, labor and materials Goods
therein mentioned and for which said charges were made, were of the value therein stated, and were sold, furnished and delivered by
Claimant to said Debtor as the special instance and request of Debtor on the dates, and as therein set forth; that there is now due
from said Debtor to Claimant the sum of Seven hundred and fifty Dollars (\$ 750.00)
with interest thereon from 19; that no part of said debt has been paid, and there are no deduct-
ions, offsets, or counter claims of any kind except such as are set forth in said statement of account.

Subscribed and sworn to before me this 19
day of March, A. D. 1965
and I hereby certify that I am, by the laws of the state named
in the Venue of this affidavit, duly authorized to administer
oaths.

Charles R. Busby
(party making affidavit sign here)

Velma D. Mc Nutt
Notary Public
My commission expires: VELMA D. Mc NUTT, Notary Public
OXFORD, PA. CHESTER COUNTY
My Commission Expires January 6, 1969.

Account of W.L. Patton, Battles Wharf, Alabama owed to Ripco, Inc.

Invoice #2200 dated 12/26/59

2 Ripco Air Unloaders			2390.00
1/14/60	Payment	390.00	Balance 2000.00
2/10/60	"	100.00	1900.00
5/27/60	"	100.00	1800.00
Account to Dun & Bradstreet			
12/22/60	"	50.00	1750.00
1 /17/62		50.00	1700.00
4/26/62		150.00	1550.00
7/ 5/62		100.00	1450.00
11/5/62		100.00	1350.00
1/4/63		200.00	1150.00
2/4/63		200.00	950.00

6/18/63 In a telephone conversation with Mr. W.J. Brown,
C.R. Busby agreed that a figure of \$1000.00 as
balance due would be acceptable at this time.

		1000.00
9/3/63	150.00	850.00
4/15/64	100.00	750.00

This is the current balance of this account.

720.6453
Garth
SUMMONS

RIPCO, INC.,

PLAINTIFF,

VS:

W. L. PATTON,

DEFENDANT.

Received 29 day of March 1965
and on 6 day of April 1965
I served a copy of the within Summons
on W. L. Patton

By service on T. P. Patton
Taylor Wilkins
TAYLOR WILKINS Sheriff
By Roy Randall D. S.

G. H. H.

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

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA