

LAW OFFICES
MYLAN R. ENGEL
910 VAN ANTWERP BUILDING
MOBILE, ALABAMA

April 11, 1966

MAILING ADDRESS:
POST OFFICE BOX 1045
MOBILE, ALABAMA 36601

TELEPHONE
AREA CODE 205
438-3625

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Continental Motors, Inc. vs.
Mrs. H. P. Holman and H. P. Holman
Case No. 6777

Dear Mrs. Duck:

Would you please dismiss this case and send us the cost
bill.

Very truly yours,

ENGEL AND SMITH



Leo A. Smith, Jr.

LASjr:mfe

CONTINENTAL MOTORS, INC.,
a corporation,

Plaintiff,

VS.

MRS. H. P. HOLMAN and
H. P. HOLMAN, jointly
and severally,

Defendants.

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

:

:

:

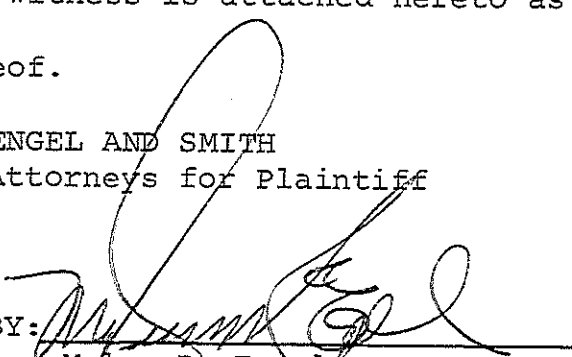
CASE NO. 6722

The Plaintiff claims of the Defendants the sum of
THREE HUNDRED SIX AND 11/100 (\$306.11) DOLLARS, due from them
by account, which sum of money, together with interest thereon,
is still due and unpaid.

An itemized statement of the account sued on, verified
by the Affidavit of a competent witness is attached hereto as
Exhibit "A" and made a part hereof.

ENGEL AND SMITH
Attorneys for Plaintiff

BY:


Mylan R. Engel
910 Van Antwerp Bldg.
P. O. Box 1045
Mobile, Alabama

The Defendant may be served at :

114 Fig Street
Fairhope, Alabama

FILED

DEC 7 1965

ALICE L. DUCK, CLERK
REGISTRY

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, the undersigned authority in and for the state and county aforesaid, personally appeared Jadie Garrett, Jr., who is known to me, and known to be Gen. Manager of Continental Motors, Inc., and who, having been first duly sworn, deposes and says upon his oath that he has personal knowledge of the itemized account attached hereto, and that the same is true and correct, and that no part of same has been paid.

Jadie Garrett, Jr.
AFFIANT

Subscribed and sworn to before me this

3rd day of December, 1965.
John H. Regor
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.



2901 GOVERNMENT BLVD.
MOBILE, ALABAMA
PHONE GR 1-5446

Sent. 1964

Mr. and Mrs.
H. P. HOLMAN
114 FIG STREET
FAIRHOPE, ALABAMA

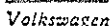
NO DISCOUNT. ACCOUNTS DUE 10TH OF MONTH FOLLOWING PURCHASE.
PLEASE DETACH THIS STUB AND MAIL WITH REMITTANCE

DATE	ITEMS	CHARGES	CREDITS	BALANCE
	PREVIOUS BALANCE			306.11

FORM 233-DL

CONTINENTAL MOTORS, INC.

NOVICE OKLAHOMA CITY



CONTINENTAL MOTORS, INC.

2901 Government Blvd. Telephone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106

27644

INVOICE NO.

3505-01

Mr. and Mrs.

H. P. HOLMAN

114 FIG 8T.

FAIRHOPE, ALA.

113 1903 817

REP. DATE	MILEAGE	LICENSE	RECEIVED	PROMISED
8/22/63	26224	5 12351	---- A.M. P.M.	Wait A.M. P.M.

		☐ ENG. OIL CHANGE		☐ TRANSM. OIL CHANGE		☐ LUBRICATION		☐ WASH				
MILE MAINTENANCE SERVICE												
AZ		Check Clutch complete (report)						N/C				
MA1a		R & R Eng. Assy.						7 50				
MA1a		R & R Clutch plate and disc.						2 50				
MA12b		R & R Clutch release brg.						50				
AZ		Replace clutch return spring						2 50				
AZ		Reface fly wheel						2 00				
In the event it becomes necessary to secure the services of an attorney in order to collect any amount due hereunder, I agree to pay all costs of collection, including a reasonable attorney's fee, whether the same be collected by suit or otherwise, and I do hereby expressly waive as to this debt all my rights to claim exemption under the Constitution and Laws of the State of Alabama.												
I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. I ALSO ACKNOWLEDGE THAT YOU ARE NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND YOUR CONTROL. X			GAS. OIL		PRICE		LABOR		REPAIRS		15 00	
			GALS. GAS						WASH/LUBE			
			QTS. ENG. OIL						VW PARTS		13 82	
			PTS. TRANS. OIL						ACCESSORIES & TIRES			
			TOTAL GAS AND OIL						MISC. MERCHANDISE			
									GAS. OIL			
									SUBLET REPAIRS			
									SUB TOTAL			
									SALES TAX		95	
									TOTAL		34 77	
☐ CASH ☐ INTERNAL		CHARGE		QUALITY CONTROL BY								
ESTIMATE \$												
SERVICE ADVISER		OK'D BY		SERVICE ADVISER								

ACCOUNTING



Volkswagen

CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106



MATERIAL ISSUE

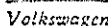
PAGE No. _____

DATE _____

QTY.	PART NO.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.	
1	111111025AX	P. Plate		10.95			
2	111111021BX	O. Plate		5.65			
3	111111733A	Spring		1.10			
4	111207113	Seal		1.75			
5				18.45			
6		OP 20%		1.37			
7				18.82			
8							
9							
10							
11							
12							
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22							
23							
			TOTAL				
			SALES TAX				
			GRAND TOTAL				

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



2901 Government Blvd. Telephone 471-5446

MOBILE, ALABAMA.

DEALER NO. 407/106

27677

INVOICE NO.

36-3895

Mr. and Mrs.
H. P. HOLMAN
FAIRHOPE, ALA.

REP. DATE	MILEAGE	LICENSE	RECEIVED	PROMISED
8/23/63	86402	5 12351	A.M. P.M.	A.M. Wait P.M.

113 1903817

		☐ ENG. OIL CHANGE	☐ TRANSM. OIL CHANGE	☐ LUBRICATION	☐ WASH																																								
MILE MAINTENANCE SERVICE																																													
AZ	Check Eng. Compression				1 75																																								
AZ	Adjust Accelerator Cable				N/C																																								
AZ	XXXXX Minor Eng. Tune Up				5 00																																								
AZ	Remove Carburetor Top and clean Carburetor				2 00																																								
AZ	Remove Eng. pan and Weld muffler flange at cylinder head																																												
	Tight side				6 00																																								
	Steam Clean Eng.				N/C																																								
In the event it becomes necessary to secure the services of an attorney in order to collect any amount due hereunder, I agree to pay all costs of collection, including a reasonable attorney's fee, whether the same be collected by suit or otherwise, and I do hereby expressly waive as to this debt all my rights to claim exemption under the Constitution and Laws of the State of Alabama.																																													
I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. I ALSO ACKNOWLEDGE THAT YOU ARE NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND YOUR CONTROL. X		<table border="1"> <tr> <td>GAS. OIL</td> <td>PRICE</td> </tr> <tr> <td>GALS. GAS</td> <td></td> </tr> <tr> <td>QTS. ENG. OIL</td> <td></td> </tr> <tr> <td>PTS. TRANS. OIL</td> <td></td> </tr> <tr> <td colspan="2">TOTAL GAS AND OIL</td> </tr> </table>		GAS. OIL	PRICE	GALS. GAS		QTS. ENG. OIL		PTS. TRANS. OIL		TOTAL GAS AND OIL		<table border="1"> <tr> <td>LABOR</td> <td>REPAIRS</td> <td>13 75</td> </tr> <tr> <td></td> <td>WASH/LUBE</td> <td></td> </tr> <tr> <td>VW PARTS</td> <td></td> <td>10 05</td> </tr> <tr> <td colspan="2">ACCESSORIES & TIRES</td> <td></td> </tr> <tr> <td colspan="2">MISC. MERCHANDISE</td> <td></td> </tr> <tr> <td colspan="2">GAS. OIL</td> <td></td> </tr> <tr> <td colspan="2">SUBLET REPAIRS</td> <td></td> </tr> <tr> <td colspan="2">SUB TOTAL</td> <td></td> </tr> <tr> <td colspan="2">SALES TAX</td> <td>50</td> </tr> <tr> <td colspan="2">TOTAL</td> <td>26 30</td> </tr> </table>		LABOR	REPAIRS	13 75		WASH/LUBE		VW PARTS		10 05	ACCESSORIES & TIRES			MISC. MERCHANDISE			GAS. OIL			SUBLET REPAIRS			SUB TOTAL			SALES TAX		50	TOTAL		26 30
GAS. OIL	PRICE																																												
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LABOR	REPAIRS	13 75																																											
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VW PARTS		10 05																																											
ACCESSORIES & TIRES																																													
MISC. MERCHANDISE																																													
GAS. OIL																																													
SUBLET REPAIRS																																													
SUB TOTAL																																													
SALES TAX		50																																											
TOTAL		26 30																																											
☐ CASH ☐ INTERNAL CHARGE		QUALITY CONTROL BY																																											
ESTIMATE \$																																													
SERVICE ADVISER		OK'D BY		SERVICE ADVISER																																									

ACCOUNTING



CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106

MATERIAL ISSUE

PAGE No. _____

DATE _____

QTY.	PART No.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.	
1	4 204110175	Plugs		4.40			
2	4 111905449	Cap		1.40			
3	1 SP182	Coils		1.45			
4	1 111905295	Coupl		1.05			
5	4 111905445	Conn.	30	1.50			
6	1 111919081A	Switch		1.35			
7				9.85			
8		Plu 50/10		1.00			
9				10.05			
10							
11							
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23							
			TOTAL				
			SALES TAX				
			GRAND TOTAL				

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106



MATERIAL ISSUE

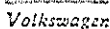
PAGE No. _____

DATE _____

	QTY.	PART NO.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.	
1	1	N 11 0083	N 2		.05			
2	1	N 120082	"		.05			
3	1	Z 1013401	W (add)		32.00			
4	2	900800	Com		130			
5					32.40			
6			900 50/8		15			
7					32.05			
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
				TOTAL				
				SALES TAX				
				GRAND TOTAL				

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



2901 Government Blvd. Telephone 471-5446

MOBILE, ALABAMA

20106

INVOICE NO.

Abstract

H. P. HOLMAN
114 FIG ST.
FAIRHOPE, ALA.

113 04.3 5334 344

REP. DATE	MILEAGE	LICENSE	RECEIVED	PROMISED
9/11/63	24777	2A1188	---- A.M. P.M.	Wait A.M. P.M.

[illegible]

ACCOUNTING



CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5416

MOBILE, ALABAMA

DEALER NO. 407/106

MATERIAL ISSUE

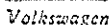
PAGE NO. _____

DATE _____

QTY.	PART NO.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.
1	11111025	AX COVER R		9.10		
2	11111027	AX DISC		1.50		
3	11211527	SCD		.10		
4	11190544	CONN		.60		
5	11190544	CAP		.20		
6	11112901	SCD		1.95		
7	11112945	PUMP		1.90		
8	11111513	ROD END		.70		
9				21.05		
10		PL. 2%		.42		
11				21.47		
12						
13						
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21						
22						
23						
			TOTAL			
			SALES TAX			
			GRAND TOTAL			

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



2901 Government Blvd. Telephone 471-5446

MOBILE, ALABAMA

20193

INVOICE NO.

36582

Mr. and Mrs.
H. P. HOLMAN
114 FIG ST.
FAIRHOPE, Ala.

113 1903817

REP. DATE	MILEAGE	LICENSE	RECEIVED	PROMISED
9/11/63	89106	5 12351	--- A.M. P.M.	Wait A.M. P.M.

☐	ENG. OIL CHANGE	☐	TRANSM. OIL CHANGE	☐	LUBRICATION	☐	WASH
MILE MAINTENANCE SERVICE							
AZ	Repair car and refinish as per estimate. furnish paint and material for above work						280 45
AZ	Remove front axle for inspection. Replace damage parts.						
	Repair as per estimate						58 75
In the event it becomes necessary to secure the services of an attorney in order to collect any amount due hereunder, I agree to pay all costs of collection, including a reasonable attorney's fee, whether the same be collected by suit or otherwise, and I do hereby expressly waive as to this debt all my rights to claim exemption under the Constitution and Laws of the State of Alabama.							
I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. I ALSO ACKNOWLEDGE THAT YOU ARE NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND YOUR CONTROL. X			GAS. OIL	PRICE	LABOR	REPAIRS	339 20
			CALS. GAS			WASH/LUBE	
			QTS. ENG. OIL		VW PARTS		157 24
			PTS. TRANS. OIL		ACCESSORIES & TIRES		
			TOTAL GAS AND OIL		MISC. MERCHANDISE		
☐ CASH ☐ INTERNAL			CHARGE	QUALITY CONTROL BY	GAS. OIL		
ESTIMATE \$					SUBLET REPAIRS		
					SUB TOTAL		
					SALES TAX		7 86
SERVICE ADVISER			OK'D BY		SERVICE ADVISER	TOTAL	504 30

ACCOUNTING



Volkswagen

CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106

MATERIAL ISSUE

PAGE No. _____

DATE _____

QTY.	PART NO.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.	
1	111411123	Knob		.30			
2	111341123A	Axle Beam		42.40			
3	4 111401301	Brg.	2.05	8.20			
4	1 111405105B	Arm		9.95			
5	1 111405301	Knuckle		10.95			
6	1 111405351	Link		8.35			
7	1 111405402A	Shi.		.25			
8	1 111405501	Washer		.20			
9	1 111405511	Cap		.06			
10	1 111405517	Seal		.05			
11	1 111405532	Return		.15			
12	1	Axle Pin Set		4.45			
13	1	King Pin Set		2.00			
14	2 111413401A	Roller	.60	1.20			
15	4 N185161	Y. Spring	.20	.80			
16	2 111899115	Pad	.20	.40			
17	2 N102542	Roller	.15	.30			
18	2 111405681	Lock		.10			
19	3 N125221	Pin		.15			
20	1 111821021F	Y. Spring		24.95			
21	1 111821305H	"		18.95			
22	1 111821715	Wash		.75			
23							
			TOTAL				
			SALES TAX				
			GRAND TOTAL				

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



Volkswagen

CONTINENTAL MOTORS, INC.

2901 Government Blvd. Phone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106

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MATERIAL ISSUE

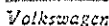
PAGE No. _____

DATE _____

QTY.	PART No.	DESCRIPTION	UNIT PRICE	VW - PARTS	ACCESS. TIRES	MISC.	
1	1137071774	Bow		12.55			
2	1137071118	Bumper		16.70			
3	1117071354	Brace		1.75			
4	112707232	Brace		1.75			
5	113707234	Brace		1.75			
6	1138535250	Meatling		1.30			
7	4113853588	Coil		.20			
8	21103501	Belt		.40			
9	21110083	Alt		.10			
10	5200W900060	Cam	.15	.75			
11	11171211	Yucc		.05			
12	1118235098	Latch		.25			
13	11125361	Pin		.05			
14				174.71			
15		Less 10% Tax Co.		17.47			
16				157.24			
17							
18							
19							
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21							
22							
23							
			TOTAL				
			SALES TAX				
			GRAND TOTAL				

FORM V-512 NORICK OKLAHOMA CITY

PARTS INVENTORY



2901 Government Blvd. Telephone 471-5446

MOBILE, ALABAMA

DEALER NO. 407/106

28199

INVOICE NO.

3525

Mr. and Mrs.
H. P. HOLMAN
114 FIG STREET
FAIRHOPE, ALA.

REP. DATE	MILEAGE	LICENSE	RECEIVED	PROMISED
9/11/63	89106	5 12351	----- A.M. P.M.	Wait A.M. P.M.

113 1903 817

		☐ ENG. OIL CHANGE	☐ TRANSM. OIL CHANGE	☐ LUBRICATION	☐ WASH
		MILE MAINTENANCE SERVICE			
AZ	Repair steering sector as necessary - Overhaul sector				8 50
Vl8c	Replace king pin and bushings and link pins - right side				14 25
AZ	Send seats to AAA for repairs				-----
AZ	Repaint car - NOT COVERED BY INSURANCE				10 00
In the event it becomes necessary to secure the services of an attorney in order to collect any amount due hereunder, I agree to pay all costs of collection, including a reasonable attorney's fee, whether the same be collected by suit or otherwise, and I do hereby expressly waive as to this debt all my rights to claim exemption under the Constitution and Laws of the State of Alabama.					

I hereby authorize the above repair work to be done along with the necessary material, and hereby grant you and/or your employees permission to operate the car or truck herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car or truck to secure the amount of repairs thereto. I ALSO ACKNOWLEDGE THAT YOU ARE NOT RESPONSIBLE FOR LOSS OR DAMAGE TO CARS OR ARTICLES LEFT IN CARS IN CASE OF FIRE, THEFT OR ANY OTHER CAUSE BEYOND YOUR CONTROL.

x

☐ CASH

☐ INTERNAL

CHARGE

QUALITY CONTROL BY

ESTIMATE 5.

SERVICE ADVISER

OK'D BY

SERVICE ADVISER



GAS, OIL

PRICE

GALS. GAS

QTS, ENG. OIL

PTS. TRANS. OIL

TOTAL GAS AND OIL

Acknowledgments

REPAIRS

WASH/LUBE

VW PARTS

ACCESSORIES & TIRES

MISC. MERCHANDISE

GAS, OIL

Repair seats AAA
SUBLET REPAIRS

SUB TOTAL

SALES TAX

TOTAL

ACCOUNTING

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA
BALDWIN COUNTY

No. 6777.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mrs. H.P. Holman and H.P. Holman, Jointly
& Severally

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 Mrs. H.P. Holman
and H.P. Holman, Jointly & Severally, Defendant.....
by Continental Motors, Inc., a Corporation
....., Plaintiff.....

Witness my hand this.....7th.....day of.....December.....1965.....

EX-12-9-65-420 Allice J. Suck Clerk

No. 6777.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CONTINENTAL MOTORS, INC., A Corp.

Plaintiffs

vs.

MRS. H.P. HOLMAN, & H.P. HOLMAN,

Jointly & Severally

Defendants

SUMMONS AND COMPLAINT

Filed December 7, 1965

Alice J. Duck Clerk

ENGEL & SMITH

P.O. Box 1045
Mobile, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

DEC 10 1965

TAYLOR WILKINS

SHERIFF

I have executed this summons

this Dec 9, 1965
by leaving a copy with

Mrs. H.P. Holman &
H.P. Holman

1400
TAYLOR WILKINS, Sheriff
Randall
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Ray Randall Deputy Sheriff

Super