

JOE BULLARD OLDSMOBILE, INC.,
a corporation,

Plaintiff,

vs.

DANIEL J. POTTER, Indivi-
dually, and doing business
as Potter's Garage,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW.

NO. 3304

COUNT I


The plaintiff claims of the defendant \$156.62, due from him by account on the 1st day of April, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT II

The plaintiff claims of the defendant \$156.62 due from him on account stated between the plaintiff and the defendant on the 1st day of April, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant \$156.62, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on the 23rd day of October, 1956, and on divers occasions before, which sum of money with interest thereon, is still unpaid.


Attorney for Plaintiff

This account is verified by
affidavit attached hereto
and made a part of this complaint.



STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority in and for aforesaid county and state, who as a notary public under my seal of office, which seal of office is hereto attached, personally appeared J. B. Bullard

known to me, who being duly sworn, upon his oath stated he is President of JOE BULLARD OLDSMOBILE, Inc. a

corporation organized and doing business under the laws of ALABAMA, that as such he makes this affidavit; that he is familiar with the books and business of JOE BULLARD OLDSMOBILE, Inc., that the attached account against

Peters Garage is just ~~the~~ correct within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said Peters

Garage at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of _____ Dollars (\$ 156⁶²) with interest from _____, 19__ is justly due and remain unpaid.

J. B. Bullard
Sworn to, subscribed, acknowledged, signed and sealed before me, as a notary public under my seal of office, with my seal hereto affixed on this the 12 day of

July, 1957
G. R. McLean

A Notary Public in and for the
State of ALABAMA at Large.
County of Mobile

Served on 6 day of August 1957
at Fairhope, Ala
by Daniel J. Potter

by service on _____
TAYLOR WILKINS, Sheriff
By Ellugh Steadham

Fairhope, Ala

Sheriff claims 70 miles @
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Steadham
DEPUTY SHERIFF

3304

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3304

JOE BULLARD OLDSMOBILE, INC.
a corp.

Plaintiff

vs.

DANIEL J. POTTER, Ind. and
d/b/a Potter's Garage

Defendant

SUMMONS AND COMPLAINT

James G. Owens

FILED

AUG 2 1957

AUG 1 DICK, CLARK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

Defendant resides in Fairhope,
Alabama (East Fairhope Ave.)

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

--AUGUST-----TERM, 1957.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Daniel J. Potter, Ind. and d/b/a

Potter's Garage

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 Daniel J. Potter,
Ind., and d/b/a Potter's Garage
-----, Defendant---

by Joe Bullard Oldsmobile, Inc., a corp.

-----, Plaintiff---

Witness my hand this 1 day of August 1957.

Leslie J. Duck Clerk