

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

August 19, 1957

3315

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

Dear Mrs. Duck:

Inre: Allison of Florida, Inc.
Vs: J. L. Pierson, Ind. and
d/b/a Sand Bar
Our File: 3962

With this we are handing you summons and complaint, together with itemized and verified statement of account, in the above styled cause, along with check for Court costs in the sum of \$20.00.

Please process and oblige.

Yours very truly,



ts
encl.
8-29-57
cc: (dup) Dun & Bradstreet, Inc.

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

September 12, 1957

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

Dear Mrs. Duck:

Inre: Allison of Florida, Inc.
Vs: J. L. Pierson, Ind.
and d/b/a Sand Bar
Case No. 3315
Our File: 3962

In this case, sheriff made a return "Not Found" in my county.

Request alias issued against "J. L. Pierson" but put on the alias that Mr. Pierson resides at "2110-A, Bragg Avenue, Mobile, Alabama", and oblige.

Yours very truly,



EGR/ts
cc: (dup) Dun & Bradstreet, Inc.
9-22-57

E. G. RICKARBY

BANK BUILDING

FAIRHOPE, ALABAMA

January 7, 1958

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

Dear Mrs. Duck:

Inre: Allison of Florida, Inc.
Vs: J. L. Pierson, d/b/a
The Sand Bar
Our File: 3962
Case No. 3315

Request you enter up judgment by default in the above mentioned case and advise when same has been completed.

Suit was filed on the 21st day of August, 1957 and answer was not made by defendant.

Thanks.

Yours very truly,



ts
1-16-58
cc: Dun & Bradstreet, Inc.

126.20
721.20
760
440

7

ALLISON OF FLORIDA, INC.,
A Corporation,

PLAINTIFF,

-VS-

J. L. PIERSON, Individually
and doing business as
SAND BAR,

DEFENDANT

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


C O M P L A I N T

Count I

The Plaintiff claims of the Defendant ONE HUNDRED AND TWENTY DOLLARS AND TWENTY CENTS (\$120.20) due from him by account on the 24th day of May, 1956, which sum of money with the interest thereon is still unpaid.

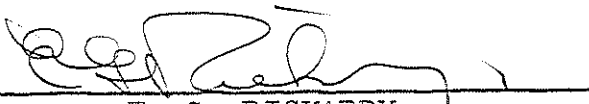
Count II

The Plaintiff claims of the Defendant ONE HUNDRED AND TWENTY DOLLARS AND TWENTY CENTS (\$120.20) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 24th day of May, 1956, which sum of money with the interest thereon is still unpaid.



E. G. RICKARBY,
Attorney for the Plaintiff.

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.



E. G. RICKARBY,
Attorney for the Plaintiff.

VERIFICATION FOR STATEMENT OF ACCOUNT

STATE OF FLORIDA

 COUNTY

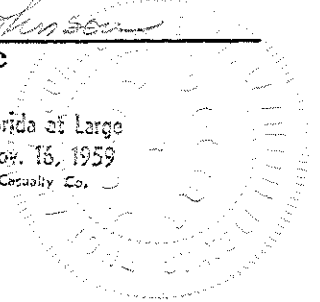
Before me, the undersigned Notary Public, personally appeared Charles W. Ray, who, being duly sworn, deposes and says that he is Vice President of ALLISON OF FLORIDA, INC., the owner of the attached account and that the attached account is a correct statement of account between ALLISON OF FLORIDA, INC. and J. L. PIERSON, Individually and d/b/a THE SAND BAR, and that there is owing from the said J. L. PIERSON & SAND BAR to the said ALLISON OF FLORIDA, INC., the sum of One hundred twenty and 20/100 - - - - - (\$120.20), with interest from June 24, 1956.

Charles W. Ray
AFFIANT

Subscribed and sworn to before me on this the 15th day of August, 1957.

Thomas E. Johnson
Notary Public

Notary Public, State of Florida at Large
My Commission Expires Nov. 16, 1959
Bonded By American Fire & Casualty Co.



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. L. PIERSON, Individually and
doing business as SAND BAR,

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 J. L. PIERSON,
Individually and d/b/a SAND BAR, Defendant

by ALLISON OF FLORIDA, INC., A Corporation,

....., Plaintiff

Witness my hand this 21 day of Aug 19 57

Dee J. - [Signature] Clerk