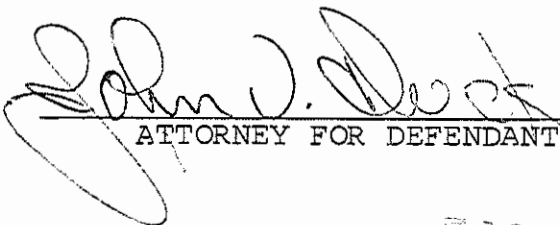


F. A. MARTINY & SON,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW CASE NO. 7219
R. ROY REYNOLDS, d/b/a	)	
REYNOLD FIRESTONE STORE,	)	
Defendant.	)	

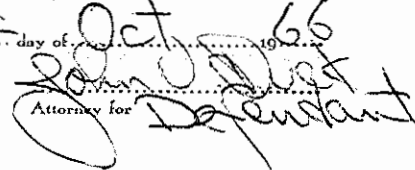
Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and for grounds thereof, assigns the following separately and severally:

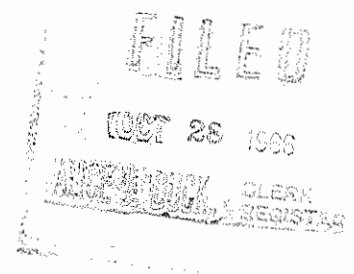
1. That said Bill of Complaint does not state a cause of action.
2. That the purported itemized and verified statement of the account sued on does not sufficiently allege what the Defendant is called upon to defend.
3. That the purported itemized and verified statement of account does not show any merchandise, goods or chattels sold.
4. That the purported itemized and verified statement of the account is not in proper form.


 ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 26th day of Oct, 1966

 Attorney for Defendant



SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons R. ROY REYNOLDS, d/b/a REYNOLD FIRESTONE STORE, 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, Alabama, at the place of holding same by F. A. MARTINY & SON.

Witness my hand this the 24 day of October, 1966.

Deane French
Clerk

** ** *

COMPLAINT

F. A. MARTINY & SON,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
R. ROY REYNOLDS, d/b/a REYNOLD FIRESTONE STORE,	X	Case No. <u>9719</u>
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 82/100 DOLLARS (\$276.82), due from him by account on, to wit: the 30th day of June, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 82/100 DOLLARS (\$276.82), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 30th day of June, 1966, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 82/100 DOLLARS (\$276.82), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 30th day of June, 1966, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 20th day of October, 1966.

Forest A. Christian
Forest A. Christian, Attorney for the
Plaintiff, P. O. Drawer 190, Foley, Alabama

Defendant's address:

Section & Magnolia Streets
Fairhope, Alabama

EX-10-26-66

FILED

24 1966

CLERK
REGISTER

THE STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, within and for the Parish and State aforesaid, on this day personally appeared L. O. Martiny (Owner) known to me who, being by me duly sworn, states on oath that the foregoing and annexed account in favor of F. A. Martiny and Son

*which is a corporation organized and existing under the laws of the State of _____ and of which corporation affiant is the authorized _____

Agent, Attorney, President or Secretary

(or) *which is a co-partnership consisting of _____ and of which co-partnership affiant is _____

Member, Agent or Attorney

And which account is against R. Roy Reynolds dba Reynolds Firestone Store for the sum of Two hundred seventy-six dollars and 82/100 (\$276.82) Dollars is within the knowledge of affiant, just and true; that it is due and unpaid, and that all just and lawful offsets, payments and credits have been allowed.

Sworn to and subscribed before me, the 20th day of October A. D., 1966.

L. O. Martiny
Notary Public

Notary Public

*ERASE ACCORDING TO FACTS

F. A. MARTINY & SON

NAME **Reynold Firestone**
Section & Magnolia Sts.
 ADDRESS **Fairhope, Ala.**

SHEET NO.

RATING

CREDIT LIMIT

DATE	FOLIO	DEBIT	CREDIT	BALANCE	OLD BALANCE
127		131.99 ✓			
5.175		20.33 ✓			
137		20.56 ✓		132.56 ✓ ←	
82		137.31 ✓			
80		5.27 ✓		264.60 ✓ ←	132.56
716			132.56 ✓	132.04 ✓ ←	264.60
3952		125.91 ✓			
1933		128.10 ✓		245.14 ✓ ←	132.04
374		191.62 ✓		436.76 ✓ ←	245.14
3366		1.92 ✓		434.84 ✓ ←	436.76
4.117		74.59 ✓			
3.407		53.80 ✓		504.05 ✓ ←	434.84
754			132.04 ✓	372.01 ✓ ←	504.05
4213		138.53 ✓		510.54 ✓ ←	372.01
5469		19.96 ✓		490.58 ✓ ←	510.54
771			88.87 ✓	401.71 ✓ ←	490.58
4307		36.25		437.96 ✓ ←	401.71
768			101.71 ✓	336.25 ✓ ←	437.96
4411		81.99		418.24 ✓ ←	336.25
4411		1.00		419.24 ✓ ←	418.24
4533		37.73		456.97 ✓ ←	419.24
726			100.00 ✓	356.97 ✓ ←	456.97
2019		44.05		401.02 ✓ ←	356.97
2.128		41.65		442.67 ✓ ←	401.02
810			100.00 ✓	342.67 ✓ ←	442.67
2213		23.45		366.12 ✓ ←	342.67
2356		17.85		383.97 ✓ ←	366.12
2228		22.85		405.92 ✓ ←	383.97

NCR

B-8129 (B-BUFF) (GT-GREENTINT)

PAPER PATENTED BY NCR CO.

100.00 ✓

307.97

← 405.92

B

NAME Reynold Firestone
Section & Magnolia Sts.
Fairhope. Ala.

SHEET NO.

RATING

CREDIT LIMIT

N.O. Credit Mens Assn 6/21/66

DATE	FOLIO	DEBIT	CREDIT	BALANCE	OLD BALANCE
				<i>305.92</i>	
6-30-66	2	59.64	40.75	346.67	305.92
6-30-66	25	58.26	77.04	423.71	346.67
6-30-66	7	8.90	100.00	323.71	423.71
6-30-66	27	46.00	48.93	372.64	323.71
6-30-66	17	46.59	35.53	408.27	372.64
6-30-66	27	9.29	100.00	308.27	408.27
6-30-66	17	48.09	18.55	326.82	308.27
6-30-66	30	11.00	50.00	276.82	326.82

Received 24 Oct 1966
and on 26 Oct 1966
I served a copy of this writ on R. Roy Reynolds
on R. Roy Reynolds
by service on James S. Inge

TAYLOR WILKINS Sheriff
By Roy Randall D. 94

SUMMONS AND COMPLAINT

F. A. MARTINY & SON,

PLAINTIFF,

VS

R. ROY REYNOLDS, d/b/a REYNOLD
FIRESTONE STORE,

DEFENDANT.

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

FILED
7/10/67
FEB 10 1967

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA