

RATCLIFF'S FIRESTONE INC.,
a Corporation,

Plaintiff,

vs.

J. L. BLACKMON, Ind. and
J. L. BLACKMON d/b/a J & L
MOTORS.

Defendant.

X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7402

Comes now J. L. Blackmon, who is named as Defendant in the above styled cause and moves this Honorable Court to set aside the Judgment entered against him on the 14th day of November, 1967, and for grounds thereof says:

1.

That he has never been served with a Summons and Complaint in this cause of action, and that to the best of his knowledge and belief no summons and complaint has been left at his residence.

Your Petitioner further says that he has a meritorious defense to this cause of action.

WILTERS & BRANTLEY

BY: *Lang J. Wilters, Jr.*
Attorney for the Defendant

Motion having been made to set aside the Judgment in the above styled cause, the same is set for hearing on the 3rd day of January, 1968, at 11:00, A M.

FILED

DEC 20 1967

ALICE J. DUCK

CLERK
REGISTER

James A. Madaleno
Circuit Judge

AMENDED COMPLAINT

RATCLIFF'S FIRESTONE, INC.,
a corporation

Plaintiff

vs

J. L. BLACKMON, individually and
J. L. BLACKMON, d/b/a J & L
MOTORS

Defendant

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7402

Comes Ratcliff Firestone, Inc., a corporation and
amends the complaint heretofore filed in this cause to
read as follows:

RATCLIFF'S FIRESTONE, INC.,
a corporation

Plaintiff

vs

JACK BLACKMON, individually and
JACK BLACKMON, d/b/a J & L
MOTORS and J. LYNN BLACKMON,
d/b/a J & L MOTORS

Defendants

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

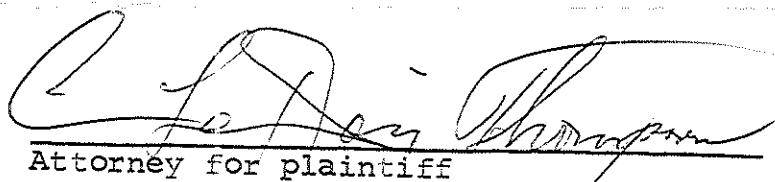
NO. 7402

-1-

The plaintiff claims of the defendants Five Hundred Eighty-
six and 15/100 (\$586.15) Dollars due from him by account on
the 11th day of May, 1966, which sum of money, with the interest
thereon, is still unpaid.

-2-

The plaintiff claims of the defendants Three Hundred Eighteen
and 60/100 (\$318.60) Dollars due from him by account on the 29th
day of October, 1966, which sum of money, with the interest
thereon, is still unpaid.


Attorney for plaintiff

FILED

JAN 9 1968

ALICE J. DUCK

CLERK
REGISTER

7402

Pritchett's Firestone
Inc. a Corp.

Plt

vs.

Jack Blackmon, ind. +
Jack Blackmon d/b/a
J + L Motors + J. Lynn
Blackmon, d/b/a
J + L Motors.
Plt

Amended Compt.

FILED

JAN 9 1968

ALICE J. DUCK

CLERK
REGISTER

E. Benoit Thompson, Atty

Received 9 day of Jan 1968
and on 23 day of Jan 1968
received a copy of the within Compt.
Jack Blackmon +
J. L. Blackmon
by service on

TAYLOR WILKINS, Sheriff

By W A Talbot D.

RATCLIFF'S FIRESTONE, INC., X
a Corporation, X

Plaintiff, X

vs. X

JACK BLACKMON, individually X
and JACK BLACKMON, d/b/a X
J & L MOTORS and J. LYNN X
BLACKMON, d/b/a J & L MOTORS X

Defendants. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE No. 7402

Comes now the Defendants in the above styled cause
and for answer to the Complainant's Complaint and each count
thereof, says:

1.

Not guilty.

2.

That they have paid the debt, for the recovery of
which this suit was brought before the action was commenced.

WILTERS & BRANTLEY

BY:

Henry J. Wilters Jr.
Attorneys for Defendant

Defendants demand a trial
by jury.

Henry J. Wilters Jr.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17 day of February,
1968, served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

Henry J. Wilters Jr.

FILED

FEB 19 1968

ALICE J. BECK

CLERK
REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. L. Blackmon, individually, and J. L. Blackmon, d/b/a J & L Motors to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Ratcliff's Firestone, Inc., a corporation.

WITNESS my hand this 2nd day of March, 1967.

Alice J. Duck

The defendant may be served
c/o Still Motor Co.
Bay Minette, Alabama

RATCLIFF'S FIRESTONE, INC.,
a corporation

Plaintiff

vs

J. L. BLACKMON, individually and
J. L. BLACKMON, d/b/a J & L
MOTORS

Defendant

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7462

-1-

The plaintiff claims of the defendant Five Hundred Eighty-six and 15/100 (\$586.15) Dollars due from him by account on the 11th day of May, 1966, which sum of money, with the interest thereon, is still unpaid.

-2-

The plaintiff claims of the defendant Three Hundred Eighteen and 60/100 (\$318.60) Dollars due from him by account on the 29th day of October, 1966, which sum of money, with the interest thereon, is still unpaid.

Leif H. Thompson
Attorney for plaintiff.

FILED

MAR 7 1967

ALICE J. DUCK, CLERK & REGISTER

830

7402

Ratcliff's Firestone,
Inc. a corp.

vs.

J. L. Blackmon ind
& J. L. Blackmon, d/b/a
J. L. Motors.

Received 7 day of March 1967
and on 12 day of Oct 1967
I served a copy of the within etc
on J. L. Blackmon

My service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
1/4 miles East of Bly

Sheriff claims 8 miles at
Ten Cents per mile Total \$ 1.80
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

FILED
MAR 7 1967
ALICE J. DUCK, CLERK
REGISTER

C. LeNoir Thompson
Atty