GATE CITY TABLE CO., INC.,

IN THE CIRCUIT COURT OF

a corporation,

BALDWIN COUNTY, ALABAMA

Plaintiff,

:

AT LAW

VS:

:

JOHN A. HOEHN, Individually and d/b/a HOEHN'S TRADING

CENTER,

Defendant

NO. 7458

Comes now JOHN A. HOEHN, individually and doing business as HOEHN'S TRADING CENTER, Defendant in the above captioned cause, and for answer to the bill of complaint heretofore filed by the Plaintiff does say as follows, separately and severally:

- 1. Not guilty.
- 2. The material allegations of the complaint are untrue.
- 3. The Defendant is not indebted to the Plaintiff, GATE CITY TABLE COMPANY, INC.

McDERMOTT, SLEPIAN & FEIBELMAN Attorneys for Defendant

Bv.

RONALD P. SLEPIAN

Defendant respectfully demands a trial by jury.

McDERMOTT, SLEPIAN & FEIBELMAN

Attorneys for Defendant

0001

DP. SLEPIAN

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this and day

FILED

JN **5** 1967

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STATE OF ALABAMA,	CIRCUIT COURT, BALDWIN COUNTY, NO.
COUNTY OF BALDWIN.	TERM, 1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon JOHN A. HOEHN, Individually, and doing business as HOEHN'S TRADING CENTER, 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 JOHN A. HOEHN, Individually, and doing business as HOEHN'S TRADING CENTER, Defendant, by GATE CITY TABLE CO., INC., a Corporation, Plaintiff.

WITNESS my hand this / day of / , 1967.

GATE CITY TABLE CO., INC., a Corporation,

Plaintiff,

IN THE CIRCUIT COURT OF

WS.

BALDWIN COUNTY, ALABAMA,

JOHN A. HOEHN, Individually, & AT LAW.

d/b/a HOEHN'S TRADING CENTER,

Defendant.

COMPLAINT

Count I.

The Plaintiff claims of the Defendant THREE HUNDRED THREE AND 70/100 DOLLARS (\$303.70), due from him by account, on, to-wit, the 19th day of March, 1965, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THREE AND 70/100 DOLLARS (\$303.70), due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 19th day of March, 1965, which sum of money with the interest thereon is still unpaid.

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CITY OF ATLANTA SS:	
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COUNTY OF 2 OLD ON	
ON THE 22nd day of MARCH	1966, before me, personally appeared
ON THE ZZIIQ day of TAXIOL SIDNEY PAZOL	who being duly sworn or affirmed,
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according to law, doth depose and say,	
a. Use when one person owns the business. (a) He is an individual trading as	·
b. Use when Concern is a part (b) That he and	
are partners trading as	
c. Use when Concern is a cor- (c) That he is an agent for GATE CITY I	ARIE CO TNC
poration.	1 1 - Calla Casa of (and) High His
, a corporation incorporated that the annexed account against HOHEN'S TRADING CENT	ERof <u>ATMORE, ALABAMA</u>
that the annexed account against	original entry of
is, and is known by him to be correctly copied from the books of c	that the charges were made in said books
GATE CITY TABLE CO INC	1:1 will absence were made were sold and delivered as charged
at or about the time of their respective dates; that the goods for a the special instance and request of the debtor; that the charges at the special instance and request of the debtor; that the charges are the special instance and request of the debtor;	which said charges were made were only true as stated; or if an
at the special instance and request of the debtor, that the charge	the part horself and deponent declares it to be his belief that
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the signature thereto is genuine, that there is now due and owing	thereon fromday of
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at the rate of, that no part of said sum	has ever been paid or in any manner settled, and that there are no
deductions or offsets of any kind, except such as are therein specif	ed and dedited.
Given under my band and official seal and subscribed	/ - //
and sworn to before me this, 23 day of	Lines Par.l
and sworn to yellow the things 1967	
Don't Linguerman	
Notary Public	4 8 8
My commission expires My Commission Expires Dec. 15, 1969	A. 36.36

Cont'd, Summons & Complaint: Gate City Table Co., vs. Hoehns.

Count III.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THREE AND 70/100 DOLLARS (\$303.70), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 19th day of March, 1965, which sum of money with the interest thereon is still unpaid.

E. G. RICKARBY, Attornov for Plaintiff

Defendant's address is Daphne, Alabama.

APR 10 1987 AJGE J. MIJK, CLERK INVOICE COP

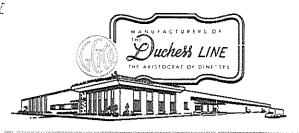
Sate City Table Company Inc.

970 HUFF ROAD, N. W. PHONE TRINITY 2-3553 AREA CODE 404
P. O. BOX 2898 • ATLANTA, GEORGIA 30318

SHIP VIA

OUR TRAILER

HOEHN'S TRADING CENTER 124 E WASHINGTON AVE ATMORE ALABAMA



3719°° 1965

SALESMAN

HIRSE

INVOICE NO.

E10567

TERMS: 2% 10 DAYS - NET 30 DAYS

F.O.B. ATLANTA

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<u>.</u>	1	69 95	#SE834/N370 9PC BRONZETONE DUSK CHERRY - RUST SEVILLE	69 95
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WE ARE NOT RESPONSIBLE FOR GOODS AFTER TAKING RECEIPT FROM TRAINSPORTATION CO. FOR THEM IN GOOD ORDER.

ALL ERRORS AND RECLAMATIONS WILL BE SATISFACTORILY ADDISTED IF PROPERLY REPORTED.

SECTION OF THE PROPERTY REPORTED.

Sate City Table Appreciates Your Business

issocived 2 day of Roll 1967

strid on 4 day of May 1967

French a copy of the within OVC hate City Juble Co
on John Q. Wook

By service on Arms

TAYLOR WILKINS, Sheritt

By Randoll D. S. I. D. W. J. J. J.

Ten Cents per mile Total \$5.

TAXLOR VILKINIS, Sheriff
BY COLOR OF COLOR

E.LR.