LAW OFFICES

7605

Mailing Address P.O. BOX 471

CODE 205 Telephone: 928-9826

### E. G. RICKARBY 35 South Section Street

FAIRHOPE, ALABAMA 36532

July 8, 1967

Mrs. Alice Duck Clerk of the Circuit Court Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: The B. F. Goodrich Co.

Vs: Frank Middleton File: 66-330

Please process this Summons & Complaint, and I am enclosing deposit for costs.

Yours very truly,

EGR/jlb Encls. 7-18-67 STATE OF ALABAMA, COUNTY OF BALDWIN.

CIRCUIT COURT,	BALDWIN	COUNTY,
NO. 12/15	TERV	, 1967.

# TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon FRANK MIDDLETON 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 FRANK MIDDLETON, Defendant, by THE B. F. GOODRICH COMPANY, a Corporation, Plaintiff.

WITNESS my hand this 10 day of tu 10111 Q THE B. F. GOODRICH COMPANY. A Corporation, Q IN THE CIRCUIT COURT OF Plaintiff, Ŏ BALDWIN COUNTY, ALABAMA, VS. Ŏ AT LAW. FRANK MIDDLETON, Ŏ Defendant. Ŏ

# COMPLAINT

#### Count I.

The Plaintiff claims of the Defendant THREE HUNDRED FIFTY-ONE AND 66/100 (\$351.66) DOLLARS due from him by account, on, to-wit, the 20th day of January, 1966, 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 Dsfendant the sum of THREE HUNDRED FIFTY-ONE AND 66/100 (\$351.66) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 20th day of January, 1966, which sum of money with the interest thereon is still unpaid.

## Count III.

The Plaintiff claims of the Defendant the sum of THREE HUN-DRED FIFTY-ONE AND 66/100 (\$351.66) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 30th day of October, 1965, and the 20th day of January, 1966, which sum of money with the interest thereon is still unpaid.

E. G. RICKARBY, Attorney for Plaintiff.

Plaintiff's address is Route 1, Loxley, Alabama.

JUL 10 10 MARTINES

# AFFIDAVIT IN PROOF OF CLAIM

STATE OF OHIO, SUMMIT	COUNTY, SS,	
The undersigned	ALBERT R. BLANCHARD	·
	tates that he is Assistant Treasurer of The B.F.Goodrich Company	
a corporation under the laws of th	ne State of New York, the owner of the claim againstFRANK MIDDLETON	
hereto attached and made a part	thereof: that the same and every item thereof is lawful and justly due	: that the consideration
thereof is goods sold and delivered	d as per itemized statement attached hereto and made a part hereof: tha	
	Three hundred fifty-one and 66/100	100 Dollars,
§ 351.66 100 with inte	erest at the rate of per cent, per annum	
***************************************	from the day of	19
that there are no payments on said	l claim in the way of discounts or otherwise; that there are no offsets nor	counterclaims whatever
against the same		
and there is no usury therein; that	at the said ownerhasno collateral, personal or other security w	hatever for the same.
Sworn to before me	(Affiant) (Affiant) (21st Jay of Jay	une 67
WILLIAM J. HENTGES, Attorney At Law Notary Public - State of Ohio My commission has no expiration date. Section 147 03 R C	MY COMMISSION EXPIRES	autges

A But it is the whole was the MIDD/ETON Last Name Regular (A First Name
No. Street or R.F.D. Str. & Box Credit Line Initial Da County City & Zone 8000 96 4-36 37
Reference Debit Explanation Credit Balance 218 4-553-4118 takes 5401 54013 45 85/ 360 13 683966 520 40 5453 23904 1 9364 23924 23408 20280 102031 37333 1100 00 TE DECIV 2/2/4 2830N 3544 553993 5000 主魔 4

FORM 4708 5-1-54 LITHO, IN U.S.A.

TAYPOR WILKINS, Sheriff
By Kockete Chicanges

Sheriff claims 40 miles at

Ten Cents per mile Total &

The B.7. Goodrich Co

Frank Middleton

JUL 10 1967