

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

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 GUARANTEE MOTOR & TRANSMISSION, INC.

90 Telegraph Road

Mobile, Alabama

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.....

Guarantee Motor & Transmission, Inc.

....., Defendant.....

by I. V. Dixon

....., Plaintiff.....

Witness my hand this 27th day of October 19 67

Reinhold Clerk

No. 178006

Page 4473

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

I. V. DIXON

Plaintiffs

vs.

GUARANTEE MOTOR & TRANSMISSION,
INCORPORATED
Defendants

SUMMONS AND COMPLAINT

Filed 10/27/67

19

Clerk

OWENS & PATTON

Attorneys

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

90 Telegraph Road
Mobile, Alabama

Received

OCT 27 1967

TAYLOR WILKINS

Sheriff

Sheriff

I have executed this summons

this 19

by leaving a copy with

10-31-67

Not found in my County after due
best effort and inquiry.

HAYD HINDSON, Sheriff

By J. P. Pendergast, D. A.

Sheriff

Deputy Sheriff

I. V. DIXON,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	LAW SIDE.
GUARANTEE MOTOR & TRANSMISSION,	)	
INC., a corporation,	)	
Defendant.	)	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of TWO THOUSAND DOLLARS (\$2,000.00) damages for the conversion by it on the 1st day of June, 1967, of the following chattel: One (1) 1958 Ford Truck, Model No. 800, the property of the Plaintiff.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of TWO THOUSAND DOLLARS (\$2,000.00) due from it for money on the 22nd day of May, 1967, received by the Defendant to the use of the Plaintiff, which sum of money, with the interest thereon, is still unpaid.

OWENS AND PATTON

By: Walter S. Patton
Attorney for Plaintiff.

FILED

OCT 27 1967

ALICE J. BERRY CLERK
REGISTER

I. V. DIXON,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
GUARANTEE MOTOR & TRANSMISSION,	)	
INC., a corporation,	)	LAW SIDE. NO. 7808
Defendant.	)	

AMENDED COMPLAINT:

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed by him by adding certain defendants so that as amended, the same shall read as follows:

I. V. DIXON,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
GUARANTEE MOTOR & TRANSMISSION,	)	
INC., a corporation;	)	LAW SIDE. NO. 7808.
ROSS E. KEY, JR.;	)	
T. & BARNETT GARAGE; and	)	
JOHN DOE, whose name to the	)	
Plaintiff is otherwise unknown	)	
and whose true name when as-	)	
certained will be substituted	)	
by amendment, being that firm,	)	
person, corporation, partner-	)	
ship or association who was the	)	
operator of the motor and trans-	)	
mission establishment located at	)	
90 Telegraph Road, Prichard,	)	
Mobile County, Alabama;	)	
Defendants.	)	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) damages for the conversion by them on the 1st day of June, 1967, of the following chattel: One (1) 1958 Ford Truck, Model No. 800, the property of the Plaintiff.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) due from them for money on the 22nd day of May, 1967, received by the Defendants to the use of the

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 2808

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GUARANTEE MOTOR & TRANSMISSION, INC.
ROSS E. KEY, JR., T. & BARNETT GARAGE, 90 Telegraph Road, Prichard,
Mobile County, Alabama.

.....
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.....
Guarantee Motor & Transmission, Inc., et al......, Defendant.....

by I. V. DIXON

....., Plaintiff.....

Witness my hand this 18th.....day of.....December..... 19. 67.

Ex - 12-19-67

Allice J. Luck, Clerk

No. 1848

Page:

4552
53
Page.....
(3)

STATE OF ALABAMA

Baldwin County

~~CIRCUIT COURT~~

W.D. Dixon

Plaintiffs

VS.

Attorneys for Defendants
Merrimack One -

SUMMONS AND COMPLAINT

Filed 19

DEC 18 1967

Clerk

ALICE J. BUCK

CLERK
REGISTER

Deena & Peter
Plaintiff's Attorney

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office

DEC 18 1967

ALOR WILKINS

848811

Sheriff

I have executed this summons

December 19 67
this 19.....

by leaving a copy with

by leaving a copy with

Ross E. Key, Jr., and being unable to locate Guarantee Motor & Transmission and T & Barnett Garage in my county after diligent search and inquiry, these copies of writ are returned "Not Found", xxx

Randy Bandy Sheriff
L. D. Perkins Deputy Sheriff

J. J. R. R. R. Deputy Sheriff

Plaintiff, which sum of money, with the interest thereon, is still unpaid.

OWENS AND PATTON

By: Walter J. Patton
Attorneys for Plaintiff.

FILED

DEC 18 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

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 GUARANTEE MOTOR & TRANSMISSION, INC.

90 Telegraph Road

Mobile, Alabama

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.....

Guarantee Motor & Transmission, Inc.

....., Defendant.....

by I. V. Dixon

....., Plaintiff.....

Witness my hand this 27th day of October 19 67

Reinhold Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

J. V. DIXON

Plaintiffs

vs.

GUARANTEE MOTOR & TRANSMISSION,
INC., A CORPORATION

Defendants

SUMMONS AND COMPLAINT

Filed 10/27/67 19.....

Clerk

OWENS & PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

90 Telegraph Road
Mobile, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

I. V. DIXON,

Plaintiff,

vs.

GUARANTEE MOTOR & TRANSMISSION,

INC., a corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant the sum of TWO

THOUSAND DOLLARS (\$2,000.00) damages for the conversion by it

on the 1st day of June, 1967, of the following chattel: One (1)

1958 Ford Truck, Model No. 800, the property of the Plaintiff.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of TWO

THOUSAND DOLLARS (\$2,000.00) due from it for money on the 22nd

day of May, 1967, received by the Defendant to the use of the

Plaintiff, which sum of money, with the interest thereon, is still

unpaid.

OMENS AND PATTON

By:

Attorney for Plaintiff.

OCT 27 1967

CLERK
REGISTER

00181801
 00-000000
 00-000000
 00-000000

RECORDED FOR DISTRICT
 BY: *[Signature]*
 OAKES AND BYLTON

number.

Districts' after sum of money, after the interest thereon, to still
 day of May, 1901, received by the defendant to the use of the
 THOUSAND DOLLARS (\$3,000.00) due from the sum of money on the 1st

the Districts' claims of the defendant are the sum of

COUNT TWO:

1900 Ford Truck, Model No. 800, the property of the defendant
 on the 1st day of June, 1901, of the defendant's credit on the
 THOUSAND DOLLARS (\$3,000.00) due from the sum of money on the 1st

the Districts' claims of the defendant are the sum of

COUNT ONE

Defendant.

INC. & corporation
 GUARANTEE MOTOR & TRANSMISSION

as

Districts'

I. A. DIXON

THE SIDE

BY THE COURT

IN THE CIRCUIT COURT OF

[Handwritten notes and signatures in right margin]

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 2808

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GUARANTEE MOTOR & TRANSMISSION, INC..
ROSS E. KEY, JR., T. & BARNETT GARAGE, 90 Telegraph Road, Prichard,
Mobile County, Alabama.

.....
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.....
Guarantee Motor & Transmission, Inc., et al. Defendant.....

by I. V. DIXON
....., Plaintiff.....

Witness my hand this 15th day of December 19.67.
Alice J. Luck, Clerk

No..... Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....
by leaving a copy with

Sheriff

Deputy Sheriff

I. V. DIXON,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	
GUARANTEE MOTOR & TRANSMISSION,	)	BALDWIN COUNTY, ALABAMA
INC., a corporation,	)	LAW SIDE. NO. 7808
Defendant.	)	

AMENDED COMPLAINT:

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed by him by adding certain defendants, so that as amended, the same shall read as follows:

I. V. DIXON,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	
GUARANTEE MOTOR & TRANSMISSION,	)	BALDWIN COUNTY, ALABAMA
INC., a corporation;	)	
ROSS E. KEY, JR.;	)	LAW SIDE. NO. 7808.
T. & BARNETT GARAGE; and	)	
JOHN DOE, whose name to the	)	
Plaintiff is otherwise unknown	)	
and whose true name when as-	)	
certained will be substituted	)	
by amendment, being that firm,	)	
person, corporation, partner-	)	
ship or association who was the	)	
operator of the motor and trans-	)	
mission establishment located at	)	
90 Telegraph Road, Prichard,	)	
Mobile County, Alabama;	)	
Defendants.	)	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) damages for the conversion by them on the 1st day of June, 1967, of the following chattel: One (1) 1958 Ford Truck, Model No. 800, the property of the Plaintiff.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) due from them for money on the 22nd day of May, 1967, received by the Defendants to the use of the

Handwritten notes:

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- 9000
- 7000
- 8000
- 9000

By: Walter S. Patton
Attorneys for Plaintiff.

FILED

DEC 18 1967

ALICE J. DUCK

CLERK
REGISTER

plaintiff, which sum of money, with the interest thereon, is still
unpaid.

OWENS AND PATTON

W. H. Z. H. W.

Attorneys for Plaintiff.

FILED
DEC 18 1961
ALICE T. DUCK
REGISTER
CLERK

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Dub 2

R. 170

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bad
3 + Bonnet Hange
90 Delequap R Rd

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 2808

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GUARANTEE MOTOR & TRANSMISSION, INC.
ROSS E. KEY, JR., T. & BARNETT GARAGE, 90 Telegraph Road, Prichard,
Mobile County, Alabama.

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.....
Guarantee Motor & Transmission, Inc., et al., Defendant.....

by I. V. DIXON

....., Plaintiff.....

Witness my hand this 18th day of December 1967.

Alfred J. Duck, Clerk

No..... Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Defendant lives at

Received In Office

..... 19.....

Plaintiffs

I have executed this summons
..... Sheriff

vs.

this 19.....
by leaving a copy with

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Sheriff

Deputy Sheriff

I. V. DIXON,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	
GUARANTEE MOTOR & TRANSMISSION,	)	BALDWIN COUNTY, ALABAMA
INC., a corporation,	)	LAW SIDE. NO. 7808
Defendant.	)	

AMENDED COMPLAINT:

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed by him by adding certain defendants, so that as amended, the same shall read as follows:

I. V. DIXON,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	
GUARANTEE MOTOR & TRANSMISSION,	)	BALDWIN COUNTY, ALABAMA
INC., a corporation;	)	
ROSS E. KEY, JR.;	)	LAW SIDE. NO. 7808.
T. & BARNETT GARAGE; and	)	
JOHN DOE, whose name to the	)	
Plaintiff is otherwise unknown	)	
and whose true name when as-	)	
certained will be substituted	)	
by amendment, being that firm,	)	
person, corporation, partner-	)	
ship or association who was the	)	
operator of the motor and trans-	)	
mission establishment located at	)	
90 Telegraph Road, Prichard,	)	
Mobile County, Alabama;	)	
Defendants.	)	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) damages for the conversion by them on the 1st day of June, 1967, of the following chattel: One (1) 1958 Ford Truck, Model No. 800, the property of the Plaintiff.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of TWO THOUSAND DOLLARS (\$2,000.00) due from them for money on the 22nd day of May, 1967, received by the Defendants to the use of the

Plaintiff, which sum of money, with the interest thereon, is still

unpaid.

OWENS AND PATTON

Walter S. Patton

BY:

Attorneys for Plaintiff.

paid

1/2

Guarantee motor trans.

90 Telegraph Rd

R. D. 18
18
18

REGISTER
CLERK

ALICE J. DUCK