

RAYPAK COMPANY, INC., a
corporation,

Plaintiff,

vs.

GENE MCKENZIE, individually and
doing business as FAIRHOPE HEAT-
ING & AIR CONDITIONING COMPANY,

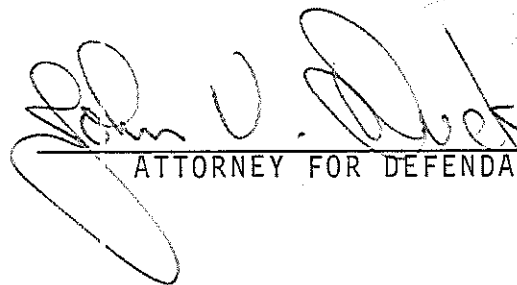
Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW

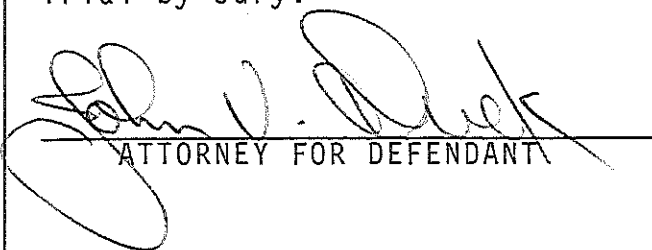
PLEA

Comes now the Defendant in the above styled cause, and for
plea to each and every count of the Bill of Complaint filed herein
says separately and severally:

"Not guilty".


ATTORNEY FOR DEFENDANT

Defendant respectfully demands a
Trial by Jury.


ATTORNEY FOR DEFENDANT

FILED

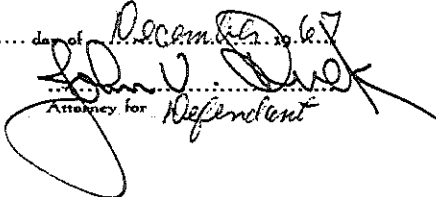
DEC 16 1967

ALICE J. DUCK CLERK
REGISTER

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.....14..... day of.....December.....1967


Attorney for Defendant

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. 1835 TERM, 1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon GENE MCKENZIE, Individually, and doing business as FAIRHOPE HEATING & AIR CONDITIONING COMPANY, 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 GENE MCKENZIE, Individually, and doing business as FAIRHOPE HEATING & AIR CONDITIONING COMPANY, Defendant, by RAYPAK COMPANY, INC., a Corporation, Plaintiff.

WITNESS my hand this 13 day of Nov, 1967.

Deirdre Muck Clerk.

RAYPAK COMPANY, INC.,	Ø	
A Corporation,	Ø	
	Ø	IN THE CIRCUIT COURT OF
Plaintiff,	Ø	BALDWIN COUNTY, ALABAMA,
VS.	Ø	AT LAW.
GENE MCKENZIE, Individually, &	Ø	
d/b/a FAIRHOPE HEATING & AIR CON-	Ø	
DITIONING COMPANY,	Ø	
Defendant.	Ø	

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant ONE HUNDRED FORTY NINE AND 96/100 (\$149.96) DOLLARS due from him by account, on, to-wit, the 3rd day of March, 1967, 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 ONE HUNDRED FORTY NINE AND 96/100 (\$149.96) DOLLARS due from him by account stated between

Cont-d, Summons & Complaint:
Raypak vs. Fairhope Heating.

the Plaintiff and the Defendant on, to-wit, the 3rd day of March, 1967,
which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FORTY
NINE AND 96/100 (\$149.96) DOLLARS due from him for merchandise, goods
and chattels sold by the Plaintiff to the Defendant between the 9th day
of September, 1966, and the 3rd day of March, 1967, which sum of money
with the interest thereon is still unpaid.



E. G. RICKARBY, Attorney for
Plaintiff.

Defendant is located at 405 North Section Street, Fairhope, Alabama.

FILED

NOV 13 1967

ALICE J. DUCK

CLERK
REGISTER

-Page 2, Two Pages-

116 Orange
NW. 7835

Received 13 day of Nov. 1967

18 day of Nov. 1967

and a copy of the within 891

Gene McKenzie

Service on Adams St. 1967

TAYLOR, WILKINSON, SHAW

R. Randall

Sheliff claims 70

Ten Cents for nls Total 700

TAYLOR, WILKINSON, SHAW

R. Randall

FILED

NOV 13 1967

ALICE J. DUCK CLERK
REGISTER

Raypak Company, Inc

USA

Gene McKenzie, Inc

d/b/a Fairhope Heating &
Air Conditioning Co

F. G. R.

MEMO-LETTER

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE December 14, 1967

Re: Raypak Co., Inc. vs. Gene McKenzie, ind.
& dba Fairhope Heating & A/C

Dear Mrs. Duck:

Enclosed please find Plea to be filed in
captioned case.

Sincerely,

John V. Duck
(KHA)

DATE

SIGNED

CODE 205
Telephone: 928-8836

LAW OFFICES

Mailing Address
P.O. BOX 471

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

November 8, 1967

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

M. 7835

Dear Mrs. Duck:

Inre: Raypak Company, Inc.
Vs: Gene McKenzie, Ind., & d/b/a Fairhope Heating
& Air Conditioning Co.
File: 67-351

Enclosed find Summons & Complaint and itemized and verified statement of account, together with check for \$25.00 Court Costs.

Please process and oblige and have Sheriff advise when debtor has been served.

Yours very truly,



jlb
Encls.
11-22-67