CODE 205 Yelephone: 928-9836

Mailing Address P.O. BOX 471

#### E. G. RICKARBY

35 SOUTH SECTION STREET FAIRHOPE, ALABAMA 36532

November 13, 1967

7846

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

Dear Mrs. Duck:

Inre: Federated Mutual Implement &

Hdwe. Insurance Co.

Vs: Robert H. Hinote d/b/a Hinote

Sand & Supply Co. File: 67-340

Enclosed find Summons & Complaint in the above styled cause, together with itemized and verified statement of account and check for \$25.00 Court costs.

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

Thanks.

Yours very truly,

jlb Encls. 12-1-67

Our File No. 57=348

Your File No. 7846

LAW OFFICES

E. G. RICKARBY

35 SOUTH SECTION STREET FAIRHOPE, ALABAMA 36532

CODE 205 Telephone: 928-9836

Mailing Address P. O. BOX 471

January 13, 1968

Honorable Telfair J. Mashburn Judge of the Circuit Court Bay Minette, Alabama 36507

Dear Judge Mashburn:

Inre: Federated Mutual
 Vs: Robert Hinote

Request Judgment by Default for \$299.35 principal and \$13.46 interest, making \$312.81 on an itemized and verified statement of account, and oblige.

Yours very truly,

Ser Com

EGR/jlb Encl. cc: Client Dup. 1-30-68 STATEMEN

Southern Division
1400 West Peachtree Street, N. W., Atlanta, Georgia 30309

ROBERT H. HYNOTE DEA/ HYNOTE SAND AND SUPPLY COMMANY P O DON 57 . ROBERTSDALE, ALABAMA

ESTECTIVE	LECTION	DESCRIPTION	CHARCE	CREDIT	BALARCE
4 20 67	581686 584357	Combination Auto Workmon's Compensation Amount needed to close accoun	, Na Isa		
		at Federated Acceptance Corp.	903.72		
2 10 67	566278	Workmen's Compensation Audit - Additional Program	94,29		Control of the Contro
3 3 67	566278	- Check a second property of the contract of t		47.15	alle de la companya de la companya La companya de la companya de l
4 3 67	- 581686	Cancelled - Return premium		408,00	TOTAL STATE OF THE
4 3 67	584357	Conceled - Return premium		245.51	
	· · · · · · · · · · · · · · · · · · ·	TOTAL	130071 170		200.05

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without 17 day of Mour 1967

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Robert H. Hinates

TAYLOR WILKINS, SI-ALL
By / - Fi / / / /

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Flderated Mutual. Implement + Hardware Unsucance, lv. a larp. Pet.

Robert A. Hinste, Ind + dHa . Hinste Sand + Dupply lo.

FLED

NOV 1 4 1967

ALICE J. DUCK CLERK REGISTER

E. D. Rickarby, AHY

STATE	OF	ATABAMA,
COUNTY	OE	F BALDWIN.

	COURT,	BALDWIN	COUNTY,
NO			
		TE	M,1967.

## TO ANY SHERIFF OF THE STATE OF ALABAMA:

WITNESS my hand this // day of

You are Hereby Commanded to Summon ROBERT H. HINOTE, Individually, and doing business as HINOTE SAND & SUPPLY CO., 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 ROBERT H. HINOTE, Individually, and doing business as HINOTE SAND & SUPPLY CO., Defendant, by FEDERATED MUTUAL IMPLEMENT and HARDWARE INSURANCE COMPANY, a Corporation, Plaintiff.

Ŏ FEDERATED MUTUAL IMPLEMENT and HARDWARE INSURANCE COMPANY, a Ŏ Corporation, Ŏ Plaintiff, IN THE CIRCUIT COURT OF Ĭ VS. BALDVIN COUNTY, ALABAMA, Ĭ ROBERT H. HINOTE, Ind., & d/b/a AT LAW. HINOTE SAND & SUPPLY CO., Ĭ 7846 Defendant. Ŏ

## COMPLAINT

## Count I.

The Plaintiff claims of the Defendant TWO HUNDRED NINETY-NINE AND 35/100 (\$299.35) DOLLARS due from him by account, on, to-wit, the 3rd day of April, 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 TWO HUNDRED NINETY-NINE AND 35/100 (\$299.35) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 3rd day of April, 1967, which sum of money with the interest thereon is still unpaid.

Be it remembered, that on this 7th day of November A. D., 197..., personally appeared before me, the undersigned authority, Wilbur S. Peck who being duly sworn, upon his oath stated that he is Accounting Manager Federated Mutual Implement and Hardware Insurance Company a corporation organized and doing business under the laws of the State of Minnesota and has been duly authorized by said corporation to make this affidavit a partnership composed of a sole trader doing business as. and that as such he makes this affidavit; that he is familiar with the books and business of

said Federated Mutual Imp & Hdw Ins Co. ; that the attached account against H. Hinote DBA Hinote Sand & Supply Co. Of Robertsdale, Ala. is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said Robert H. Hinote DBA

Hinote Sand & Supply Company its special instance and request, that credit has been duly given for all payments and at d their his just and lawful offsets to which said account is entitled as thereon stated, and that the balance 

(\$.299.35 ) with interest from...... remains unpaid.

Robert

April 3 19.67 is justly due and

I hereby certify under my official seal that I am authorized as a Notary Public to administer oaths under the laws of the State of Georgia and that the foregoing was subscribed and sworn to before me on the day and year

A. D. 19

My commission expires.....

NOV 9 1967

My Commission Expires June 15, 1970

## Cont'd, Summons & Complaint, Federated Mutual vs. Hinote.

# Count III.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY-NINE AND 35/100 (\$299.35) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 10m day of February, 1967, and the 3rd day of April, 1967, which sum of money with the interest thereon is still unpaid.

Defendant's post office address is P. O. Box 57, Robertsdale, Alabama 36567.

NOV 1 4 1967

ALCE J. DUCK CLERK REGISTER

Law Offices

Your File No. .....

E. G. RICKARBY 35 SOUTH SECTION STREET FAIRHOPE, ALABAMA 36532 CODE 205 Telephone: 928-9836

> Mailing Address P. O. BOX 471

February 17, 1969

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

Dear Mrs. Duck:

Inre: Federated Mutual Implement & Hardware Insurance

Versus Robert H. Hinote Ind. & d/b/a Hinote Sand & Gravel

Supply Company Case No. 7846

Mr. Hinote paid this off.

We deposited costs on November 13, 1967. Please see that execution is recalled. I am cancelling Judgment in the Probate Court.

Yours very truly,

EGR/jlb

cc: Dun & Bradstreet, Inc.

Dup.

2-28-69