

ROY STONE TRANSFER
CORPORATION

PLAINTIFF

VS

MARTIN RADIO & TV
COMPANY

DEFENDANT

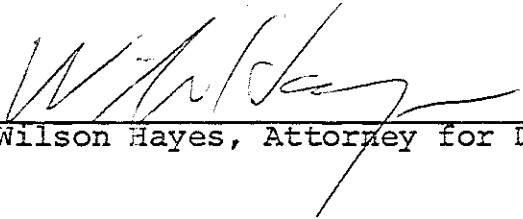
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

) AT LAW

) NUMBER: 8104
)
)
)

Comes now Defendant and amends his answer to Plaintiff's
Complaint by adding the following by way of recoupment:

Defendant says that the said debt, the basis of this
suit, was and is for freight charges for furniture hauling
performed by Plaintiff; that the Plaintiff so negligently
hauled, handled or transported the said furniture on the day
described in the Complaint and the exhibits thereto as to cause
or allow the same to be damaged by being broken and torn; that
Defendant made timely claim against Plaintiff for the said
damage in the sum of \$160.00 which Plaintiff, having had notice
has failed or refused to pay, and Defendant prays judgement
of the excess.


Wilson Hayes, Attorney for Defendant

Filed 11.13.69
Reice J. Duck
Clerk

ROY STONE TRANSFER CORPORATION)

PLAINTIFF

VS

MARTIN RADIO & TV COMPANY

DEFENDANT

IN THE JUSTICE COURT OF

PERRY McCLELLAND

---.---.---

Comes now Defendant and for answer to the complaint

says:

1. The matters alleged therein are untrue.
2. Not guilty.

W. L. Hay
Attorney for Defendant

Defendant demands trial

by jury.

This the 17th day of April,
1968.

W. L. Hay
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17th day of April
1968 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.

W. L. Hay

VERIFICATION FOR ITEMIZED STATEMENT OF ACCOUNT

STATE OF VIRGINIA,

COUNTY OF

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared

Mr. J.C. Wilson, who being first duly sworn, deposes and says that he is Vice-President for ROY STONE TRANSFER CORPORATION, which is a Corporation.

That as such an agent, affiant has knowledge of the account owed to ROY STONE TRANSFER CORPORATION by MARTIN RADIO & TV CO., which is an individual, namely, Mr. Martin doing business as MARTIN RADIO & TV. CO.

That the attached itemized statement is a true and correct statement of the account owed by MARTIN RADIO & TV CO., to ROY STONE TRANSFER CORPORATION.

That there is now owing by MARTIN RADIO & TV CO., to ROY STONE TRANSFER CORPORATION the sum of SEVENTY-FOUR AND 42/100 (\$74.42) DOLLARS, with interest from the _____ day of _____, 1968, after allowing all credits.

J.C. Wilson
Affiant
Vice-President

Subscribed and sworn to before me this the 13th day of MARCH, 1968.

Ruth N. Rupard
Notary Public

STATEMENT

Roy Stone Transfer Corporation

MARTINSVILLE, VA., Feb. 13 19 68

SHIPPER

Martin Radio & TV Co.
700 2nd. St.
Bay Minette, Alabama.

TELEPHONE 638-8851

P. O. BOX 872

POSTED DATE	ITEM	CHARGES	BALANCE
Nov. 28, 1966	53789	56.90	
Dec. 23, 1966	60998	12.78	
Jan. 21, 1967	65758	4.74	
		74.42	
I CERTIFY THIS TO BE A TRUE AND EXACT COPY OF THE ORIGINAL FREIGHT CHARGES.			74 42
ROY STONE TRANSFER CORP. MRS. JERRY THOMAS			

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

The State of Alabama,
Baldwin County

IN THE JUSTICE COURT OF

PERRY McCLELLAN d

To Any Lawful Officer of Said County, Greetings:

Summon MARTIN RADIO & TV COMPANY, Defendant,

to appear before me on or before the 17th day of May 1968, next, at my office
in Bay Minette, Baldwin County, Alabama, to answer the complaint of

ROY STONE TRANSFER CORPORATION, Plaintiff,

and then and there make a return of this summons.

Issued the 11th day of April, 1968

Perry McClellan Justice of the Peace

COMPLAINT

ROY STONE TRANSFER

CORPORATION,

Plaintiff.

VS.

Count I.

MARTIN RADIO & TV

COMPANY

Defendant.

The Plaintiff claims of the Defendant the sum of SEVENTY-FOUR & 42/100 (\$74.42) Dollars due from it by account, on, to-wit, the 21st day of January, 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 SEVENTY-FOUR AND 42/100 (\$74.42) DOLLARS due from it by account stated between the Plaintiff and the Defendant, on, to-wit, the 21st day of January, 1967, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of SEVENTY-FOUR & 42/100 (\$74.42) DOLLARS due from it for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 28th day of November, 1966, and the 21st day of January, 1967, which sum of money with the interest thereon is still unpaid.

E. G. Rickarby

Plaintiff's Attorney

E. G. RICKARBY

Defendant is located at 700 2nd Street, Bay Minette, Alabama 36507.

61-4-16-68

APR 15 1968

TAYLOR WILKINS
SHERIFF

Executed by personal service and notice of

Garnishment _____

Martin Radio & T.V. Co.
Mr. Mortimer

this *15* day of *April* 19*68*

Taylor Wilkins Constable

By *W. A. Folber* D. C.

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 1 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$
PROCESS(ES) OR A TOTAL OF \$ 1.50

No. *368*

Page _____

STATE OF ALABAMA
Baldwin County

In the Justice Court of

McClelland

Term, 19 _____

SUMMONS AND COMPLAINT

Ray Stone Transfer
Corp.

Plaintiff _____

Vs.

Martin Radio & T.V. Co.

Defendant _____

The Defendant is hereby notified that
Writ of Garnishment has been served on

J. P.

Location: _____