

THE HERTZ CORPORATION, a
Corporation,

Plaintiff,

VS.

J. A. BOONE, Individually, and
doing business as J. A. BOONE
TRUCK LINES,

Defendant.

X
X
X
X
X
X
X

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

C O M P L A I N T

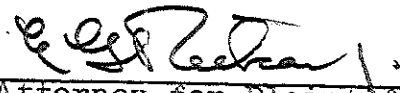
COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-FIVE AND 60/100 (\$125.60) DOLLARS due from him by account on, to-wit, the 28th day of March, 1967, which sum of money together with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

COUNT TWO

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-FIVE AND 60/100 (\$125.60) DOLLARS damages for the breach of a written agreement entered into by him on, to-wit, the 27th day of March, 1967, whereby the Defendant rented a motor vehicle. And the Plaintiff says that although it has complied with all its provisions on its part, the Defendant has failed to comply with the following provisions i.e., has failed to pay the ONE HUNDRED TWENTY-FIVE AND 60/100 (\$125.60) DOLLARS rent.

The Plaintiff further alleges that as part of the consideration of said agreement, the Defendant did agree to pay all costs and expenses, including a reasonable attorney's fee incurred in collecting the payments due from Defendant, which the Plaintiff further claims in the sum of THIRTY-FIVE AND NO/100 (\$35.00) DOLLARS.


Attorney for Plaintiff

Defendant's address is
Little River, Alabama

FILED

NOV 15 1968

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..8...

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. A. BOONE, Individually, and doing business as J. A. BOONE TRUCK LINES

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 J. A.

TRUCK LINES,
BOONE, Individually, and doing business as J. A. BOONE/.. Defendant.....

by THE HERTZ CORPORATION, a Corporation.....

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

Witness my hand this 15 day of Nov 19 68.

..... Clerk

8/ 11/27/68

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THE HERTZ CORPORATION, a

Corporation,

Plaintiffs

vs.

J. A. BOONE, Ind., & d/b/a

J. A. BOONE TRUCK LINES,

Defendants

SUMMONS AND COMPLAINT

FILED

Filed NOV 15 1968 19.....

ALICE J. DUCK

CLERK
REGISTER

E. H. R.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Little River

Received in Office

Nov. 15 1968

19.....

Sheriff

I have executed this summons

this NOV - 27 1968

by leaving a copy with

J. A. Boone, Ind. + d/b/a
J. A. Boone Truck Lines

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY W. A. Tolbert
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

W. A. Tolbert Deputy Sheriff

Little River

COUNTY OF Mobile

8G-188 (12742)

STATE OF Alabama

Be it remembered, that on this 22 day of October
A. D., 19.68, personally appeared before me, the undersigned authority,
Mr. Ed Scott, Jr. known to me
who being duly sworn, upon his oath stated that he is City Manager
of Hertz Truck Rental (The Hertz Corporation)
{ a corporation organized and doing business under the laws of the State of Delaware
{ 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 Hertz Truck Rental
J. A. Boone Truck Lines of Little River, Alabama
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said J. A. Boone
at { its }
{ their } special instance and request, that credit has been duly given for all payments and
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of One Hundred Twenty Five & 60/100 Dollars
(\$ 125.60) with interest from March 28 19.68 is justly due and
remains unpaid.

Ed Scott, Jr. X

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 Alabama at Large
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

Deana Shirley Crain
Notary Public

County of Mobile State of Alabama
My commission expires 6/26/72 A. D. 19 72



Our File No. 68-281

Your File No. _____

Law Offices

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

CODE 205
Telephone: 928-9836

Mailing Address
P. O. BOX 471

November 14, 1968

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

Dear Mrs. Duck:

Inre: The Hertz Corp. vs. Boone Truck Lines

Enclosed find Complaint of The Hertz Corporation versus
J. A. Boone.

Please process and oblige.

Yours very truly,



EGR/jlb

Encl.

cc: Dun & Bradstreet, Inc.
11-26-68