

ORIGINAL

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,  
NO. 8524

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon JOHN E. EDWARDS and CARL L. LARKINS, Individually, and doing business as SOUTH BALDWIN ELECTRIC, 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 JOHN E. EDWARDS and CARL L. LARKINS, Individually, and doing business as SOUTH BALDWIN ELECTRIC, Defendant, by AJAX ELECTRIC MOTOR CORP., a Corporation, Plaintiff.

*Witness my hand this 17 day of Jan.*  
*1969*  
*Celine J. Husek*  
Clerk.

AJAX ELECTRIC MOTOR CORP.,  
a Corporation,  
Plaintiff,

VS.

JOHN E. EDWARDS and CARL L.  
LARKINS, Ind., & d/b/a SOUTH  
BALDWIN ELECTRIC,  
Defendants.

X  
X  
X  
X  
X  
X

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

*8524*

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendants FIVE HUNDRED TWELVE AND NO/100 (\$512.00) DOLLARS due from them by account, on, to-wit, the 19th day of March, 1968, 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 FIVE HUNDRED TWELVE AND NO/100 (\$512.00) DOLLARS due from them by account stated between the Plaintiff and the Defendants on, to-wit, the 19th day of March, 1968, which sum of money with the interest thereon is still unpaid.

Cont'd, Summons & Complaint:  
Ajax Electric vs. So. Baldwin Electric.

Count III.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWELVE AND NO/100 (\$512.00) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 15th day of March, 1967, and the 19th day of March, 1968, which sum of money with the interest thereon is still unpaid.

  
\_\_\_\_\_  
E. G. RICKARBY, Attorney for  
Plaintiff.

Defendant's address is 417 South Alston Street, Foley, Alabama 36535

**FILED**

JAN 17 1969

**ALICE J. DUCK** CLERK  
REGISTER

VERIFICATION FOR ITEMIZED STATEMENT OF ACCOUNT

STATE OF NEW YORK,

COUNTY OF

Before me, the undersigned Notary Public, in and for said County, in said State, personally appeared SYLVIA G. WEINER, who being first duly sworn, deposes and says that he is secretary for AJAX ELECTRIC MOTOR CORP., which is a Corporation.

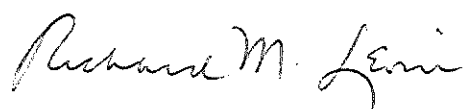
That as such Sylvia G. Weiner, affiant has knowledge of the account owed to AJAX ELECTRIC MOTOR CORP., by SOUTH BALDWIN ELECTRIC, which is a partnership composed of John E. Edwards and Carl L. Larkins, Individually, and doing business as SOUTH BALDWIN ELECTRIC.

That the attached itemized statement is a true and correct statement of the account owed by SOUTH BALDWIN ELECTRIC to AJAX ELECTRIC MOTOR CORP.

That there is now owing by SOUTH BALDWIN ELECTRIC to AJAX ELECTRIC MOTOR CORP., the sum of FIVE HUNDRED TWELVE AND NO/100 (\$512.00) DOLLARS with interest from the first day of Dec., 1968, after allowing all credits.

  
Affiant

Subscribed and Sworn to before me  
this the 20th day of December, ~~XXXX~~ 1968  
1968.

  
Notary Public, State of New York,  
County of Monroe

RICHARD M. LEVIN  
NOTARY PUBLIC, State of N. Y., Monroe County  
My Commission Expires March 30, 1969.

**FILED**

JAN 17 1969

**ALICE J. DUCK** CLERK  
REGISTER

1.153  
NO. R1153

DATE \_\_\_\_\_

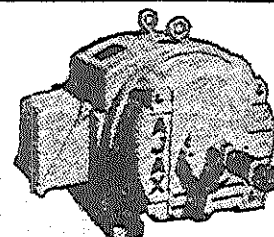
SHIP TO

VIA

## Roadway

SOLD TO

- ▶ South Baldwin Electric Co.
- 417 S. Alston Street
- Foley, Ala. 35535



IF SHIPPING CHARGES ARE PREPAID, THE WORD  
TO BE PREPAID WILL APPEAR ON THE LINE BELOW  
OTHERWISE CHARGES WILL BE COLLECT.

POSITIVELY NO ALLOWANCE WILL BE MADE FOR REPAIRS, IF MADE BY OTHERS WITHOUT OUR WRITTEN CONSENT.

# AJAX

## ELECTRIC MOTOR CORP.

**INVOICE**

Phone - Clearwater 4-3000

DATE

NO. B2306

# NEW

## MOTORS - CONTROLS - TRANSFORMERS

100 AJAX RD. • P.O. BOX 262 • ROCHESTER, N. Y.

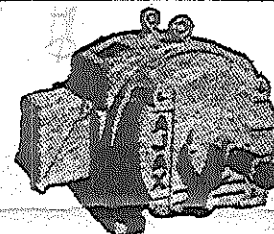
SHIP TO

VIA

Pilot

IF SHIPPING CHARGES ARE PREPAID, THE WORD  
TO BE PREPAID WILL APPEAR ON THE LINE BELOW  
OTHERWISE CHARGES WILL BE COLLECT.

SOLD TO

▶ South Baldwin Electric Supply  
• 417 S. Alston Street  
• Foley, Ala. 36535

DATE 3/19/68		ORDER NO.	TERMS NET CASH	F.O.B. <input type="checkbox"/> <del>XXXX</del> ATLANTA, GA. Rochester, NY	NO. PACKAGES 1	CLASS 77½		
QUANTITY ORDERED      SHIPPED		DESCRIPTION			WEIGHT	STOCK NO.	UNIT PRICE	TOTAL
		ELECTRIC MOTORS						
1	1	P-34					87.00	87.00

POSITIVELY NO ALLOWANCE WILL BE MADE FOR REPAIRS, IF MADE BY OTHERS WITHOUT OUR WRITTEN CONSENT.  
ON RETURNED MERCHANDISE THERE WILL BE A RESTOCKING CHARGE OF 15%WAREHOUSES: Jersey City, N. J.   Dallas, Tex.   Brooklyn, N. Y.   Plainfield, N. J.   Trenton, N. J.   Rochester, N. Y.   Chicago, Ill.  
Dayton, Ohio   Kansas City, Kan.   Kansas City, Mo.   St. Louis, Mo.   Los Angeles, Calif.   San Francisco, Calif.   Atlanta, Ga.

E4/2/12/69

Received 21<sup>st</sup> day of Jan 19 69  
and on 1<sup>st</sup> day of Feb 1969  
I served a copy of the within PVC  
on Carl L. Jenkins

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

Richard L. [unclear] D. S.  
Foley

Received 21<sup>st</sup> day of Jan 19 69  
and on 1<sup>st</sup> day of Feb 1969  
I served a copy of the within PVC  
on John E. Edwards

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

Richard L. [unclear] D. S.  
Foley

Sheriff claims \_\_\_\_\_ miles at

Ten Cents per mile Total \$ 7.20 1440

TAYLOR WILKINS, Sheriff

BY \_\_\_\_\_  
DEPUTY SHERIFF

8524

Ajay Electric  
Motor Corp. a corp.  
Pvtz.

vs.

John E. Edwards +  
Carl L. Jenkins ind  
& Alta. South  
Baldwin Electric

'ORIGINAL'

FILED

JAN 17 1969

ALICE J. DUCK

CLERK  
REGISTER

E. G. Rickaby

AJAX ELECTRIC MOTOR CORP.,  
a Corporation,  
Plaintiff,  
  
VS.  
  
JOHN E. EDWARDS and CARL L.  
LARKINS, Ind., & d/b/a SOUTH  
BALDWIN ELECTRIC,  
Defendants.

X  
X  
X  
X  
X  
X  
X

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

65-2-4

MOTION FOR NON-SUIT AGAINST JOHN E. EDWARDS, DEFENDANT

Comes the Plaintiff in the above styled cause and shows to the Court that since the filing of this action, he has been informed that the Defendant, JOHN E. EDWARDS, was not connected with SOUTH BALDWIN ELECTRIC at the time these goods were sold.

The Plaintiff, therefore, amends the Summons and Complaint by striking out JOHN E. EDWARDS, as a party defendant, and proceeds with this suit against the remaining defendant.

*E. G. Rickaby*  
Attorney for Plaintiff

**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 an envelope with adequate postage prepaid the en and properly addressed.

This 5 day of March, 1969.

E. G. RICKABY

*E. G. Rickaby*  
Attorney for Plaintiff  
P. O. Box 471, Fairhope, Ala. 36532

FILED

MAR 6 1969

ALICE J. DUCK CLERK  
REGISTER

Our File No. 68-336

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

January 2, 1969

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

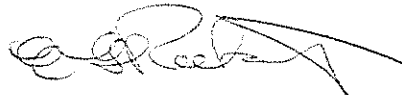
Dear Mrs. Duck:

Inre: Ajax Electric Motor Corp. vs. John E. Edwards  
and Carl L. Larkins, Ind. & d/b/a South Baldwin Electric

With this we are handing you Summons & Complaint, one copy of which to hand each defendant, and check for \$25.00 costs.

Please issue, process and oblige.

Yours very truly,



EGR/jlb  
Encl.  
cc: Client  
Dup.  
1-17-69



Our File No. 68-336

Your File No. \_\_\_\_\_

Law Offices

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

CODE 205  
Telephone: 928-9336

Mailing Address  
P. O. BOX 471

March 4, 1969

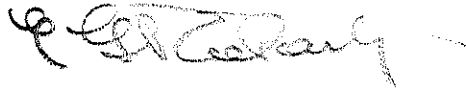
Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Ajax Electric Motor Corp. vs. South Baldwin Electric  
Case No. 8524

Enclosed find an amendment to the Summons & Complaint in the  
above styled cause.

Yours very truly,



EGR/jlb

Encl.

cc: Mr. John E. Edwards

Foley, Alabama

cc: Dun & Bradstreet, Inc.

Dup.

3-14-69