

Our File No. 69-96

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

April 10, 1969

mv. \$ 656

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

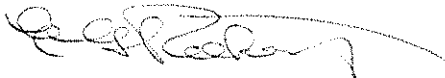
Dear Mrs. Duck:

Inre: Kohler & Campbell, Inc. vs. George Forbis

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

Please process and oblige.

Yours very truly,



EGR/jlb

Encls.

cc: London Guarantee & Accident Co.

Dup.

4-25-69

Our File No. 69-96

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

July 16, 1969

Mr. J. Conner Owen
Attorney at Law
P. O. Box 729
Bay Minette, Alabama 36507

Dear Mr. Owen:

Inre: Kohler Campbell, Inc. vs.
George Forbis

Enclosed find notice for taking depositions.

Yours very truly,

EGR/jlb

Encl.

cc: Alice J. Duck, Clerk
Circuit Court
Bay Minette, Alabama 36507

cc: F. Gwyn Harper, Jr.
P. O. Box 218
Hickory, N. C. 28601

7-18-69

KOHLER & CAMPBELL, INC.,
a Corporation,

Plaintiff,

VS.

GEORGE FORBIS,

Defendant.

X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW. 8656

NOTICE OF TAKING TESTIMONY

Under Section 474 (7) of Title 7 of the Code of Alabama

Notice is hereby given to the Defendant that the Plaintiff
at 2:00 o'clock P.M., 25 July, 1969, at the Manufacturing Plant
of Kohler & Campbell, Inc., at Granite Falls, North Carolina,
will take the depositions of

Mrs. Gayle Coffey
Route #10, Box 684
Lenoir, N. C.

Mrs. Robert C. Said
Holiday Inn
Hickory, N.C.

Mr. Louis J. Nienaber
P. O. Box 544
1314 Lakewood Drive
Greensboro, N. C.

will be taken on oral examination.

DONE THIS THE 16th day of July, 1969.

KOHLER & CAMPBELL, INC.,
Plaintiff,

BY:

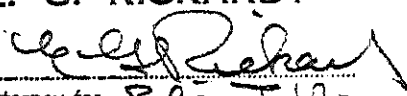

E. G. RICKARBY,
Thier attorney

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 on and properly
addressed.

This 16 day of July, 1969.

E. G. RICKARBY


Attorney for Plaintiff
P. O. Box 471, Fairhope, Ala. 36532

FILED

JUL 22 1969

ALICE J. DUCK

CLERK
REGISTER

Our File No. 69-96

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

August 4, 1969

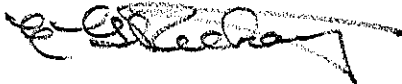
Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Kohler & Campbell, Inc. versus
George Forbis Case No. 8656

Request the case of Kohler & Campbell versus Forbis be
dismissed with prejudice upon the costs being paid by
the Defendant.

Yours very truly,



FILED

AUG 5 1969

EGR/jlb

cc: Mr. J. Connor Owens, Jr.

cc: London Guarantee & Accident Co.

Dup.

8-11-69

ALICE J. DUCK

CLERK
REGISTER

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon **GEORGE FORBIS**

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 **GEORGE FORBIS**,
_____, defendant,
by **KOHLER & CAMPBELL, INC., a Corporation**,
Plaintiff.

WITNESS my hand this 14 day of April, 19 69.

Alice J. Duck
ALICE J. DUCK, Clerk.

KOHLER & CAMPBELL, INC.,
a Corporation,

Plaintiff,

VS.

GEORGE FORBIS,

Defendant

X
X
X
X
X
X
X

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

W. 8656

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant NINE HUNDRED FORTY-NINE AND
09/100 (\$949.09)----- DOLLARS due from him
by account, on, to-wit, the 31st day of December, 19 68, 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 NINE HUNDRED FORTY-
NINE AND 09/100 (\$949.09)-----DOLLARS due from
him by account stated between the Plaintiff and the Defendant on,
to-wit, the 31st day of December, 19 68, which sum of money
with the interest thereon is still unpaid.

Continued, Summons & Complaint:

Kohler & Campbell vs. Forbis.

Count III.

The Plaintiff claims of the Defendant the sum of NINE HUNDRED FORTY-NINE AND 09/100 (\$949.09) -----DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 30th day of July, 19 68, and the 31st day of December, 19 68, which sum of money with the interest thereon is still unpaid.


E. G. RICKABY, Attorney for
Plaintiff.

Defendant's address is:

Loxley, Alabama 36551

FILED

APR 14 1969

ALICE J. DUCK CLERK
REGISTER

STATE OF North Carolina

COUNTY OF Caldwell

ss.

Robert H. Meuser

being duly sworn, deposes and says that he is Treasurer of Kohler & Campbell, Inc.,
Granite Falls, North Carolina

That the annexed account and claim is in all respects correct and true.

That the sum of Nine hundred forty nine dollars & 09/100 Dollars, (\$ 949.09)

with interest from the 60th day after date of shipment
Kohler & Campbell, Inc., Granite Falls, North Carolina ¹⁹_{day of}, is justly due and owing to
from George Forbis, Loxley, Alabama on the same.

That no payments have been made hereon except as shown in said account, and there are no offsets or counterclaims thereto either at law or in equity to the best knowledge and belief of deponent; that no judgment has been recovered thereon and no note given therefor; that no security has been received for said account except _____

That the said account is a true and correct transcript of the books of original entry of said corporation

Sworn to before me this

day of

4th
April

19 69

Monathy K. Sain
NOTARY PUBLIC.

My commission expires

April 18, 1969

Robert H. Meuser
Robert H. Meuser, Treasurer

KOHLER & CAMPBELL, INC.,
A Corporation,

Plaintiff,

vs.

GEORGE FORBIS,

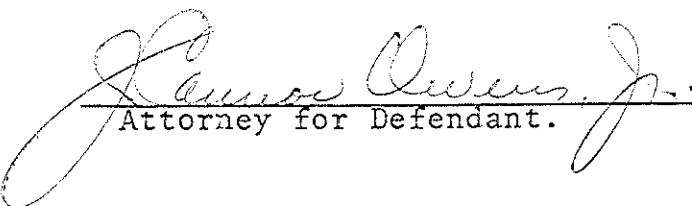
Defendant.

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

ANSWER:

Now comes the Defendant in the above styled cause and for answer to the complaint heretofore filed against him and to each count thereof, separately and severally, says:

1. Not guilty.


Attorney for Defendant.

I, the undersigned, Attorney of Record for the Defendant in the above styled cause, do hereby certify that I have caused a copy of the foregoing answer to be served on E. G. Rickarby, the Attorney of Record for the Plaintiff in said cause, by placing the same in the United States Mail, properly addressed, with postage prepaid, this 23rd day of April, 1969.


FILED

APR 24 1969

ALICE J. DUCK CLERK
REGISTERED