

JACK COLE COMPANY, INC.,
A CORPORATION

PLAINTIFF

VS.

MORACE R. HALL, d/b/a
H. R. HALL and COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1001

Now comes the Defendant and demurs to the Plaintiff's amended Bill of Complaint, and for grounds thereof says:

1. That said Complaint does not allege that a demand has been made upon the Defendant for the excess freight allegedly due.

2. For aught that appears the Defendant has not had an opportunity to adjust the said freight difference.


Attorney for Defendant

RECORDED

JACK COLE COMPANY, INC.,
A CORPORATION

PLAINTIFF

VS.

HORACE R. HALL, c/b/a
H. R. HALL AND COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1411

In law office of Hubert M.
Hall.

Dated this FILED day of March, 1950.

MAR 10 1950
ALICE A. DUCK, Clerk

Jack Cole Company, Inc.,
A corporation,

-vs-

Horace R. Hall, d/b/a
H. R. Hall and Company,
Defendent.

NO. 1441

IN THE CIRCUIT COURT FOR
BALDWIN COUNTY, ALABAMA.

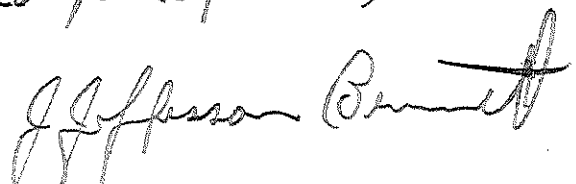
AMENDMENT TO COMPLAINT

Comes now the Plaintiff in the above styled case and amends his complaint heretofore filed herein as follows: Count Three thereof is deleted and in lieu thereof the following is inserted:

"Plaintiff claims of Defendent, to-wit, \$126.07 with interest thereon from December 27, 1948, both of which is past due and unpaid for and on account of a shipment of, to-wit, 314 pieces of marine hardware aggregating in weight, 36000 pounds from J. Thomas Scott, Inc. in the city of Philadelphia in the State of Pennsylvania, to the Defendent, H. R. Hall in the city of Mobile in the State of Alabama, all of which transportation was in a motor truck of the Plaintiff, upon which shipment the legal rate of freight chargeable for such transportation was, to-wit, \$682.27, as shown by the legal public tariff of freight charges on file and in force and effect, and fixed and approved by the Inter-State Commerce Commission of the United States of America, under which tariff the Plaintiff operates as an inter-state commerce public carrier; and Plaintiff avers that the Defendent paid for and on account of such transportation charges the sum of, to-wit, \$556.20, and that said balance of \$126.07, with the interest thereon has never been paid."


J. Jefferson Bennett, Attorney
for the Plaintiff.

2/27/50
I certify that I have this date
delivered a copy of this pleading to
the Attorney of record for defendant, Hon.
H. M. Hall.



NO. 1441

IN THE CIRCUIT COURT FOR
BALDWIN COUNTY, ALABAMA

RECORDED

Jack Cole, Company, Inc.,
A corporation,

-vs-

Horace R. Hall, d/b/a H. R.
Hall & Company,
Defendent.

AMENDMENT TO COMPLAINT

Filed 2-28-58
Doris French
clerk

JACK COLE, INC., A
CORPORATION.

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1111

HORACE R. HALL, d/b/a H. R.
Hall and Company.

DEFENDANT

Now comes the Defendant and for answer to the Plaintiff's complaint,
and to each count thereof, separately and severally, says:

1.

That the facts therein alleged are untrue.

2.

That the account sued on was paid before the commencement of this
suit.

John Lee
Attorney for the defendant

The Defendant demands a trial by Jury.

John Lee
Attorney for the Defendant

RECORDED

1441

JACK COLE, INC., A
CORPORATION.

PLAINTIFF

-VS-

MORACE R. HALL, c/b/a H. R.
HALL AND COMPANY.

DEFENDANT

FILED

DEC 29 1949

ALICE J. back, Clerk

SUMMONS AND COMPLAINT

STATE OF ALABAMA)
BALDWIN COUNTY)

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Horace R. Hall, d/b/a H. R. Hall & Company, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Jack Cole Company, Inc., a corporation.

Witness my hand, this 25th day of November, 1949.

Alice J. Duck
Alice J. Duck, Clerk

COMPLAINT

Jack Cole Company, Inc., a)
corporation,)
Plaintiff,)
-vs-)
Horace R. Hall, d/b/a H. R.)
Hall and Company,)
Defendant.)

NO. _____

IN THE CIRCUIT COURT FOR BALDWIN
COUNTY, ALABAMA.

COUNT ONE

The Plaintiff claims of the Defendant \$126.07, due from him for work and labor done for the Defendant by the Plaintiff on the 27th day of December, 1948, at his request, which sum of money, with the interest thereon, is still unpaid.

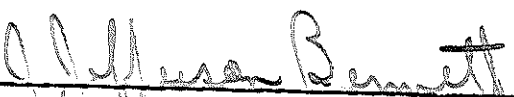
COUNT TWO

The Plaintiff claims of the Defendant \$126.07, due from him by account on the 27th day of December, 1948, which sum of money with the interest thereon, is still unpaid.

COUNT THREE

Plaintiff claims of the Defendant, to-wit, \$126.07 with interest thereon from December 27th, 1948, both of which is past due

and unpaid, for and on account of a shipment of, to-wit, 31 $\frac{1}{4}$ pieces of marine hardware, aggregating in weight, to-wit, 36000 pounds, from J. Thomas Scott, Inc., in the City of Philadelphia in the State of Pennsylvania, to the Defendant H. R. Hall, in the City of Mobile, in the State of Alabama all of which transportation was in a motor truck of the Plaintiff, upon which shipment the legal rate of freight chargeable for ~~such~~^{such} transportation was, to-wit, \$662.40, as shown by the legal published tariff of freight charges on file and in force and effect, and fixed and approved by the Interstate Commerce Commission of the United States of America; and Plaintiff avers that the Defendant paid for and on account of such transportation charges the sum of, to-wit, \$556.20, and that said balance of \$126.07, with the interest thereon has never been paid.


J. Jefferson Bennett,
Attorney for the Plaintiff.

RECORDED

NO. 1441

IN THE CIRCUIT COURT FOR BALDWIN
COUNTY, ALABAMA.

SUMMONS AND COMPLAINT

Jack Cole Company, Inc., a
corporation,
Plaintiff

-vs-

Horace R. Hall, d/b/a H. R.
Hall and Company,
Defendant

Received in Sheriff's Office
this 25 day of Nov, 1949
TAYLOR WILKINS, Sheriff

Executed Dec 8, 1949
By leaving copy with
Horace R. Hall.

Sheriff
Taylor Wilkins
By
Edwigh Steadham

FILED

NOV 25 1949

ALICE J. DUCK, Clerk

J. Jefferson Bennett
Attorney at Law
Fairhope, Ala.

STATE OF ALABAMA

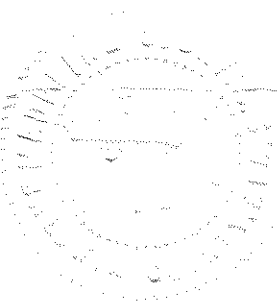
BALDWIN COUNTY

Before me the undersigned Notary Public, in and for said State and County, this day personally appeared G. S. Stough, who being by duly sworn deposes and says that, he is Secretary and Treasurer of Carl Grant Tractor Co., Inc. and that he of his personal knowledge knows that the attached account of Carl Grant Tractor Co., Inc., against Reuben Sheelan is true and correct and that the sum of One Hundred Ten and 46/100 (\$110.46) Dollars is owing from the said Reuben Sheelan to the said Carl Grant Tractor Co., Inc., after deductions of payments, set-offs, and Counter-claims.

G. S. Stough

Sworn to and subscribed before me on this the 18th day of November, 1949.

Madeline L. Burns
Notary Public, Baldwin County, Alabama.



RECORDED

Index 11-18-49
New York



J. JEFFERSON BENNETT

Attorney at Law

Pitman Building

FAIRHOPE, ALABAMA

April 7, 1950

Mrs. Alice J. Duck,
Clerk, Circuit Court,
Court House
Bay Minette, Alabama

Re: Jack Cole Company
-vs-
Horace R. Hall, No. 1441.

Dear Mrs. Duck,

Will you please enter a Non- Suit in the above case on motion of the Plaintiff and remove the file from current cases.

Will you prepare a Cost Bill in this matter and forward it to me and I will send a check in payment of same.

Very truly yours,


J. Jefferson Bennett

JJB:jmb

J. JEFFERSON BENNETT

Attorney at Law

Pitman Building

FAIRHOPE, ALABAMA

November 23, 1949

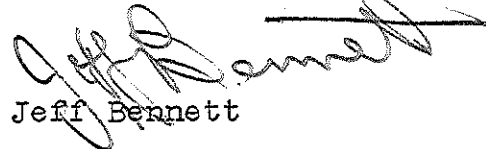
Mrs. Alice J. Duck,
Clerk, Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck,

You will find enclosed a Civil Summons and Complaint which I request you to file and issue to the sheriff for service. Will you please use the enclosed post card to notify me of the number assigned to this case, the date of Filing and the date of service of process is completed?

Thanks a lot for your kindness in handling this by mail for me.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Jeff Bennett", with a horizontal line drawn through the middle of the signature.

Jeff Bennett

JB:jb
Enclosure

No 1441

Jack Cole CO.
vs.

Horace R. Hall
d/b/a H.R. Hall & CO

For Labor

Filed 11-25-49

J. J. Bennett

RECEIVED

RECEIVED

RECEIVED

CARL GRANT TRACTOR CO., Inc.

Authorized Ford Tractor Dealer

Robertsdale, Alabama

Customer's Order No. _____ Date 9/2 19 49

Sold to Reuben Shuler

Address 70 Bay Minette, Ala.

MDSE. SOLD		MDSE. RET'D		RECD. ON ACCT-NOTE	MISC'L	PAID OUT
CASH	CHARGE	CASH	CREDIT			
	✓					

QUAN-TITY	NUMBER	ARTICLES	PRICE	AMOUNT
✓ 4	9N-12405	Spark Plugs -	65	260
✓ 1	9N-6051-	Head Gasket		1 00
✓ 1	9N-6766	Breather Cap		.50
✓ 1	9N-8260	Water Hose		55
				4 65
		1 Tax		09
				4 74
		Labor + Trip to woods (-60 mi)		10 00
				14 74

00976 Salesman

The Baldwin Times, Bay Minette, Ala.

CARL GRANT TRACTOR CO., Inc.

Authorized Ford Tractor Dealer

Robertsdale, Alabama

Customer's Order No. _____ Date 9/2 19 49

Sold to Reuben Shuler

Address _____

MDSE. SOLD		MDSE. RET'D		RECD. ON ACCT-NOTE	MISC'L	PAID OUT
CASH	CHARGE	CASH	CREDIT			
	✓					

QUAN-TITY	NUMBER	ARTICLES	PRICE	AMOUNT
✓ 1	8N-2212	2 Plate Assy Brake		7 30
✓ 1	8N-2007	Brake Lever		4 50
✓ 1	8N-2019	Brake Shoe + Spring 1/2 W.		3 55
✓ 1	8N-2217	Alal -		95
✓ 6		quarts oil		2 10
✓ 5		Gallons Tractor Lube		8 75
✓ 1	9N-564	Rod Hydro Lift Lever		6 55
✓ 1	9N-598	Chain + Clevis Assy		7 25
✓ 2	8N-660	Belt-Check Chain 60		1 20
✓ 10	8N-4130	Gaskets (5 each each) 70		70
✓ 2	8N-4248	Grease seals (each) 3 00		6 00
✓ 1		Oil Trans		1 25

00977 Salesman

The Baldwin Times, Bay Minette, Ala.

CARL GRANT TRACTOR CO., Inc.

Authorized Ford Tractor Dealer
Robertsdale, Alabama

Customer's Order No. _____ Date 9/3 19 49

Sold to Robert Shuchan

Address _____

MDSE. SOLD		MDSE. RET'D		RECD. ON ACCT-NOTE	MISC'L	PAID OUT
CASH	CHARGE	CASH	CREDIT			
	✓					

Page 2 -

QUAN-TITY	NUMBER	ARTICLES	PRICE	AMOUNT
✓ 1	8N-18667	Oil Line		35
✓ 1	2N-9155B	Fuel Bomb-		3 80
✓ 1	8N-486	Anchor Pin		3 40
✓ 1	9N-560	Pin		90
✓ 1	9N-596	Anchor RH		.25
✓ 1	8N-3679C	Lock 5 cylinder		2 40
✓ 2	9N-4131	Gaskets	11	22
✓ 1	9N-7137	oil stick		25
✓ 3	9N-574	Pinch Pins	35	105
✓ 1	9N-8100	Rad cap-		1 55
✓ 1	9N-10145	Brace		16

00978 Salesman

Received by 83

The Baldwin Times, Bay Minette, Ala.

CARL GRANT TRACTOR CO., Inc.

Authorized Ford Tractor Dealer
Robertsdale, Alabama

Customer's Order No. _____ Date 9/2 19 49

Sold to Robert Shuchan

Address _____

MDSE. SOLD		MDSE. RET'D		RECD. ON ACCT-NOTE	MISC'L	PAID OUT
CASH	CHARGE	CASH	CREDIT			
	✓					

Page 3 -

QUAN-TITY	NUMBER	ARTICLES	PRICE	AMOUNT
1		Bumper		15 00
		Total Parts		74 43
		Tax		1 29
				75 72
				75 72
		Labor, welding, brakes,		
		Hyd. Lift, steering		20 00
				95 72

00979 Salesman

Received by 837

The Baldwin Times, Bay Minette, Ala.

UNITED STATES DEPARTMENT OF THE ARMY

OFFICE OF THE ADJUTANT GENERAL

WASHINGTON, D. C.

TO: THE ADJUTANT GENERAL
FROM: THE ADJUTANT GENERAL
SUBJECT: [illegible]

1. [illegible]
2. [illegible]
3. [illegible]

4. [illegible]
5. [illegible]

6. [illegible]
7. [illegible]

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12. [illegible]
13. [illegible]

14. [illegible]
15. [illegible]

16. [illegible]
17. [illegible]

18. [illegible]
19. [illegible]

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14. [illegible]
15. [illegible]

16. [illegible]
17. [illegible]

18. [illegible]
19. [illegible]

Advised
18-49
Hewitt
D. Smith

MD 144D