

1509

LITTLE MOTOR COMPANY,
AYRES LITTLE

Plaintiff

Vs

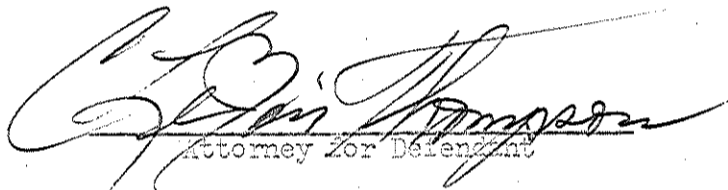
RUBIN H. JACKSON

Defendant

IN THE JUSTICE COURT OF

T. C. HAMB

Comes the Defendant and pleads specially that action by the
Complainant in the above styled cause is barred; inasmuch as Plaintiff
did not commence said action within three years from the date said
account was due.


Attorney for Defendant

LITTLE MOTOR COMPANY,
AYRES LITTLE

Plaintiff

Vs

RUBIN H. JACKSON

Defendant

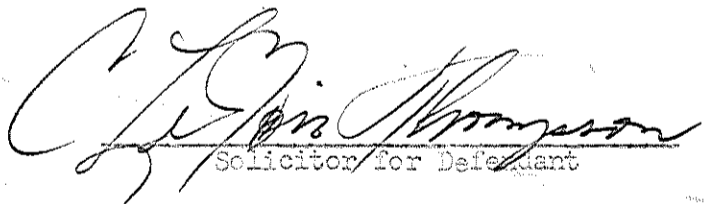
IN THE JUSTICE COURT OF

T. C. HAND

Demurrers

Comes the Defendant and for demurrer to the above styled
complaint says:

1. Said complaint does not state a cause of action.
2. That said complaint is uncertain and doubtful.
3. Said account is not alleged with sufficient certainty.
4. That said complaint does not state said account is owed
by the Defendant to the Complainant.
5. That said complaint does not state the cause of said
account.
6. That said complaint does not state between what parties
said account was incurred.
7. That said complaint does not allege whether said account
is claimed by one or both Plaintiffs.



Solicitor for Defendant

STATE OF ALABAMA, }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Rubin H. Jackson, also known as Reuben S. Jackson, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County, at the time and place for holding same, then and there to answer the complaint of Little Motor Company, also known as Little's Garage, a partnership composed of Ayres Little and Clyde N. Little.

WITNESS my hand this 24th day of September, 1952.



Clerk.

* * * * *

LITTLE MOTOR COMPANY, also known)	
as LITTLE'S GARAGE, a partnership)	IN THE CIRCUIT COURT OF
composed of AYRES LITTLE AND)	BALDWIN COUNTY, ALABAMA
CLYDE N. LITTLE,)	
PLAINTIFF,)	AT LAW
VS)	
RUBIN H. JACKSON, ALSO KNOWNAS)	NO. 1509
REUBEN S. JACKSON,)	
DEFENDANT.)	

AMENDED COMPLAINT

The Plaintiff claims of the Defendant the sum of Sixty-seven and 73/100 Dollars (\$67.73) due from the Defendant on account stated between the Plaintiff and the Defendant on to-wit: the 28th day of October 1949, which sum of money, with interest thereon, is still due and unpaid.


Attorney for Plaintiff

THE STATE OF ALABAMA, }
BALDWIN COUNTY

TO ANY LAWFUL OFFICER OF SAID COUNTY:

You are hereby required to summon Newport Industries, Inc.
personally to appear before me, T. G. Hand Justice of the Peace in and
for the County aforesaid, at my office Bay Minette, Ala on the 31
day of June, 1950, at --- o'clock of said day, to answer upon oath in a Garnish-
ment at the instance of Little Motor Co. Ayres Little vs.
Rubin H. Jackson what goods and chattels of said Defendant
you have in your hands or possession, what sum or sums of money, or quantity of merchandise or goods
and chattels you owe to the said Defendant by any existing contract; and what goods and chattels you
know to be in the hands of any other person belonging to said Defendant, and what sum or sums of money,
quantity of merchandise, goods and chattels you know to be due from any person or persons to the said
Defendant.

Given under my hand and seal at office, the 22 day of May, 1950

T. G. Hand (L. S.)
Justice of the Peace.

34

No. _____

GARNISHMENT SUMMONS

JUSTICE COURT OF

T. C. HAND

Little Motor Co Ayres Little
Plaintiff.

vs.

Rubin H. Jackson
Defendant.

Newport Industries Inc.
Garnishee

The Defendant is employed at

Executed 5-29-50
By serving copy of
the within on
Maxwell Reid agent
for Newport Ind.
Inc.

Taylor Wilkins Sheriff
677 Hall D. 5.

1509

THE STATE OF ALABAMA /
Baldwin County

IN THE JUSTICE COURT OF
T. C. HALL

TO ANY LAWFUL OFFICER OF SAID COUNTY, GREETINGS:

Summon Rubin H. Jackson

to appear before me on the 31 day of June, 1950, next, at my office in
Bay Minette, Ala. Baldwin County, Alabama, to answer the complaint of
Little Motor Co. Ayres Little

and then and there make a return of this summons.

Issued the 22 day of May, 1950

P. J. [Signature]

Justice of the Peace

COMPLAINT

Little Motor Co.
Ayres Little
Plaintiff

VS.

Rubin H. Jackson
Defendant

The Plaintiff claims of the Defendant the sum of Sixty Seven and ⁷³/₁₀₀ Dollars
Past Due On Account

On account stated between the def. and Little Motor Co. a partnership composed of Ayres Little and Clyde N. Little, also known as Little's Garage. On the 28 day of Oct. 1949 which sum of money with the interest there on is still due and unpaid.

James R. Owen

Plaintiff's Attorney

Executed by personal service and notice of

Garnishment _____

C. Gennie Thompson

this 1 day of June 1950

Taylor Walker, Sheriff, Constable

By H. F. Wall D. C.

*Service accepted
by C. Gennie Thompson
as attorney for
Ruben Jackson
this July 1, 1950*

RECORDED

RECORDED
RECOR

No. 669

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The State of Alabama,
BALDWIN COUNTY

In the Justice Court of

T. C. Hand

31 May

Term, 1950

Summons and Complaint

Little Motor Co.

Plaintiff

VS.

Rubin H. Jackson

Defendant

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

J. P.

Location: _____

Moore Printing Co., Bay Minette, Ala.

X

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THE STATE OF ALABAMA
BALDWIN COUNTY

Whereas, Little Motor Co. Ayres Little has filed a complaint before me,

T. G. Hand

, a Justice of the Peace for said Couty, upon which

a Summons has been issued by me returnable on the 31 day of May, 1950

at Bay Minette, Ala., against Rubin H. Jackson

for the sum of Sixty Seven and 73/100 Dollars, and has given bond as required

by law and has made affidavit that the said Rubin H. Jackson is indebted

to him in the sum of Sixty Seven and 73/100 Dollars; that he believes that process

of garnishment is necessary to obtain satisfaction of said claim, and that Newport Industries Inc,

is supposed to be indebted to said Defendant

Rubin H. Jackson

or has effects of said Defendant in his possession or under

his control. You are, therefore, commanded to summon the said Newport Industries Inc.

to be and appear before me on the said 31 day of

May, 1950, at Bay Minette, Ala., then and there to answer, on oath, whether and to what amount he was indebted to said defendant at the time of the service of this Writ of Garnishment, or at the time of making this answer, and whether he will not be indebted in future to him by contract then existing, and whether he has not in his possession or under his control personal or real property, or things in action, belonging to the Defendant.

Witness my hand this 22 day of May, 1950.



Justice of the Peace

RECORDED

No. _____ Page _____

STATE OF ALABAMA
Baldwin County

WRIT OF GARNISHMENT
On Summons and Complaint

JUSTICE COURT OF

T. C. HAND

Little Motor Co.
VS.

Rubin H. Jackson
Defendant

Newport Industries Inc.
Garnishee

Moore Printing Co., Bay Minette, Ala.

GARNISHMENT BOND AND AFFIDAVIT

THE STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:

That we, Little Motor Co Ayres Little are held and firmly bound unto

Rubin H. Jackson

One Hundred Thirty Six

Dollars and costs, to be paid to the said

Rubin H. Jackson

his heirs, executors, administrators and assigns: for which payment, well and truly to be made, we bind ourselves and each of us, our heirs, executors and administrators jointly, severally and firmly by these presents.

Sealed with our seals and dated this 22 day of May, in the year of our Lord,

One Thousand, Nine Hundred and Fifty

The condition of the above obligations is such, that, whereas the above bound Little

Motor Co. Ayres Little

has on the day of the above

date, commenced suit in the court of T. C. Hand

returnable on the 31

day of June, 1950, to recover of said Rubin H. Jackson

Sixty Seven and 7/100

Dollars,

and the said Plaintiff has prayed a Garnishment in said case, as provided by law.

Now, if said Plaintiff shall prosecute this suit to effect, and pay all such damages and costs to Defendant as he may sustain by the wrongful suing out of said Garnishment, this obligation to be void, otherwise to remain in full force and effect.

Approved this 22 day of

May A. D., 1950

T. C. Hand J. P.

Little Motor Co. L. S.
James R. Owen, Attorney L. S.

The State of Alabama,
BALDWIN COUNTY

Personally Appeared Before Me, T. C. Hand, a Justice of the Peace for the County

and State aforesaid Little Motor Co Ayres Little, who, being duly sworn, de-

poseth and saith that Rubin H. Jackson is justly indebted to

Little Motor Co. Ayres Little in the sum of

Sixty Seven and 7/100

Dollars, and that he has commenced suit by summons and

complaint returnable on the 31 day of June, 1950, in the Court of

T. C. Hand, and believes the process of Garnishment is necessary to obtain satisfaction of said debt, that

Rubin H. Jackson

Little Motor Co. Ayres Little

is or is supposed to be indebted to the said Little Motor Co. Ayres Little or has effects or money of the said Defendant in his hands.

Sworn to and subscribed before me this 22

day of May, 1950

T. C. Hand J. P.

Little Motor Co. - James R. Owen
Attorney

RECORDED

No. _____ Page _____

The State of Alabama,
Baldwin County

GARNISHMENT BOND AND
AFFIDAVIT

Justice's Court of

T. C. HAND

~~Little Motor Co. Ayres Little~~
Plaintiff

vs.

Rubin H. Jackson

Defendant

~~Newport Industries, Inc.~~
Garnishee

Filed in office _____ 22 _____ day of

May _____, 1950



T. C. HAND

Justice of Peace

THE STATE OF ALABAMA,
Baldwin County

KNOW ALL MEN BY THESE PRESENTS:

That we, Little Motor Co. Agnes Little.
are held and firmly bound unto Rubin H. Jackson
in the sum of One Hundred Fifty DOLLARS,

for the payment of which, well and truly to be made, we bind ourselves and each of us, our and each of our
heirs, executors and administrators, jointly and severally. But upon condition, that if the above bound

Little Motor Co. shall prosecute to effect an appeal by him taken this day to
the next term of the Circuit Court of Baldwin from a judgment
rendered against him in favor of said Rubin H. Jackson

by T. C. Hand, a Justice of the Peace for said County, for the
sum of Fifty Seven and 73/100 Dollars, debt

in said appeal, shall pay such judgment, both as to debt and costs as may be rendered against him by the
said Circuit Court then, in either
of said events, this obligation to be void, otherwise to remain in full force and effect.

Given under our hands and seals, this the 7 day of June 1945

Approved:

T. C. Hand
J. P.

Little Motor Co. (L. S.)
By June R. Owen (L. S.)
Attorney (L. S.)

RECORDED

No. C 352

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THE STATE OF ALABAMA,
Baldwin County

APPEAL BOND

JUSTICE COURT OF

T. C. Hand

Little Motor Co.

Ayer Little

Plaintiff

Rubin H. Jackson

Defendant

Filed this

7 day of June 1940

NOTICE OF APPEAL.

THE STATE OF ALABAMA, {
BALDWIN COUNTY

L

Little Motor Co.,

Ayres Little

Plaintiff.

VS.

Rubin H. Jackson

Defendant

Justice Court of

T. C. HAND.

To Rubin H. Jackson in the above cause:

You are hereby notified that Little Motor Co.

the Plaintiff in the above cause, has prayed an appeal from the judgment

rendered therein by me, and the said Little Motor Co.

having complied with the requirements of the law in such cause, the same has been granted, to the next

term of the Circuit Court Court of Baldwin

to be held for Baldwin County.

Given under my hand this 7 day of June 1935

Justice of the Peace

THE STATE OF ALABAMA,

BALDWIN COUNTY

JUSTICE COURT OF

T.C. Hand

Next Circuit Court Term, 1950

NOTICE OF APPEAL

Little Motor Co.

Ayres Little

Plaintiff

VS.

Rubin H. Jackson

Defendant

The within Writ executed by leaving a copy of the same with

C. Lenoir Thompson

Witness this 7 day of

June 1950

Taylor Wilkins

Constable: *S. Huff*

N 7 Hall

Location D.S.

THE STATE OF ALABAMA }
Baldwin County }

IN THE JUSTICE COURT OF
T. C. HAND

~~Little Motor Co. Ayres Little vs. Rubin H. Jackson~~
Plaintiff. Defendant.

Newport Industries, Inc., Garnishee

To Rubin H. Jackson, as Defendant:

You will take notice that a Writ of Garnishment has this day been issued out of this Court directed to Newport Industries, Inc. as Garnishee, in the above styled cause, said Writ of Garnishment being returnable to this Court on the 31 day of June, 1950.

Given under my hand this the 22 day of May, 1950

T. C. Hand, J. P.

Executed by handing a copy of the above to C. Genie Thompson Attorney for Rubin Jackson

as Defendant on this the 1 day of June, 1950

_____, Constable

RECORDED IN THE OFFICE OF THE CLERK OF THE JUSTICE COURT OF BALDWIN COUNTY ALABAMA

The State of Alabama
BALDWIN COUNTY

Notice to Defendant in
Garnishment


In the Justice Court of
T. C. HAND

Little Motor Co
VS.

Rubin H. Jackson
Defendant

Newport Industries Inc.
Garnishee

Filed this 22 day of May 1950


T. C. HAND J. P.
