

77 to D.S.  
Our File No. ....

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

February 25, 1971

Honorable Telfair J. Mashburn  
Judge of the Circuit Court  
Bay Minette, Alabama

Re: Mobile White Autocar Company, Inc.  
v. W. L. Roberts, Case No. 8961,  
set for Tuesday, March 9, 1971

Dear Judge Mashburn:

The defendant, Mr. Wade L. Roberts, has been adjudicated a bankrupt in Case No. 29,134. We request that the proceedings in subject matter be stayed pending bankruptcy.

Yours very truly,

E. G. Rickarby

EGR:w

cc-Mrs. Eunice Blackmon

Mrs. Blackmon, please take this case out of the docket, because of bankruptcy.

Thank you.

E.G.R.

Our File No. 69-280

Your File No. ....

Law Offices

E. G. RICKARBY

25 SOUTH SECTION STREET

FAIRHOPE, ALABAMA 36532

Code 205

Telephone: 923-9836

Mailing Address

P. O. BOX 471

October 28, 1969

NO - 8961

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

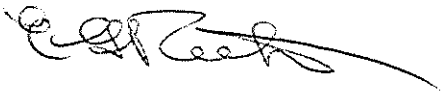
Dear Mrs. Duck:

Inre: Mobile White Autocar Company, Inc.  
versus W. L. Roberts

Enclosed find Summons & Complaint in the above styled cause,  
together with itemized and verified statement of account. Please  
process and oblige, and advise when debtor has been served.

Thanks!

Yours very truly,



DAB/jlb

Encls.

cc: Forwarder

Dup.

12-15-69

February 25, 1971

9 Dec 71

Honorable Telfair J. Mashburn  
Judge of the Circuit Court  
Bay Minette, Alabama

Re: Mobile White Autocar Company, Inc.  
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ceedings in subject matter be stayed pending bankruptcy.

Yours very truly,

  
E. G. Rickarby

EGR:w

cc-Mrs. Eunice Blackmon

Mrs. Blackmon, please take this case out of the docket,  
because of bankruptcy.

Thank you.

  
E.G.R.

Now set for Dec 13th

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 W. L. ROBERTS 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 W. L. ROBERTS, Defendant, by MOBILE WHITE AUTOCAR COMPANY, INC., a Corporation, Plaintiff.

WITNESS my hand this 30 day of Oct, 1969.

Alice J. Duck (Clerk)  
ALICE J. DUCK

MOBILE WHITE AUTOCAR COMPANY, INC., X  
a Corporation,

Plaintiff,

VS.

W. L. ROBERTS,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

No. 8961

### COMPLAINT

#### Count I.

The Plaintiff claims of the Defendant the sum of THREE THOUSAND TWO HUNDRED EIGHTY-FOUR AND 10/100 (\$3,284.10) DOLLARS due from him by account, on, to-wit, the 30th day of June, 1969, 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 THREE THOUSAND TWO HUNDRED EIGHTY-FOUR AND 10/100 (\$3,284.10) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 30 th day of June, 1969, which sum of money with the interest thereon is still unpaid.

Continued, Summons & Complaint,  
Page 2 of Two Pages:  
Mobile White Autocar vs. W. L. Roberts.

Count III.

The Plaintiff claims of the Defendant the sum of THREE THOUSAND TWO HUNDRED EIGHTY-FOUR AND 10/100 (\$3,284.10) DOLLARS due from him for work, labor and materials furnished by the Plaintiff to the Defendant between the 1st day of January, 1968, and the 30th day of June, 1969, which sum of money with the interest thereon is still unpaid.

Count IV.

The Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED FIFTY-EIGHT AND 20/100 (\$1,358.20) DOLLARS, due by promissory note made by him on the 3rd day of March, 1969, and payable on the 1st day of June, 1969, with interest thereon.

And the Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal property as exempt to him under the Constitution and laws of the State of Alabama, and the Defendant has agreed to pay an attorney's fee for the collection thereof, and the Plaintiff hereby claims the further sum of TWO HUNDRED THREE AND 73/100 (\$203.73) DOLLARS as such attorney's fee.

  
E. G. RICKAREY,  
Attorney for Plaintiff.

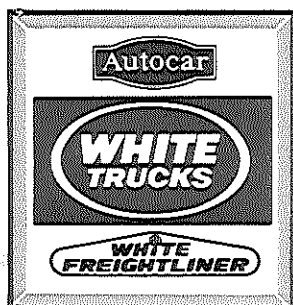
Debtor may be located at:

D & L Trucking Company, Inc.  
Robertsdale, Alabama 36567

FILED

OCT 30 1969

ALICE J. BUEY CLERK  
RECEIVED



# Mobile White Autocar Company, Inc.

SALES • SERVICE

521 BEAUREGARD STREET

P. O. DRAWER 1885

PHONE 433-4966

MOBILE, ALABAMA 36601



TRUCKS • SERVICE • PARTS • ACCESSORIES

H. J. BERT TOOLE  
PRESIDENT

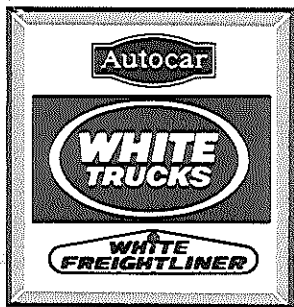
## STATEMENT OF ACCOUNT

of

W.L. ROBERTS

<u>Invoice</u>	<u>Date</u>	<u>Items</u>	<u>Total</u>
8725	4/24/68	Parts: Cable assy. 16.60 Stick 3.07 Belts, etc. .39 Repair to front motor support & speedometer: Labor 48.00 Applicable tax 1.20	\$69.26
8706	4/22/68	Repair rear spring hangers & install bolts Labor: 16.00 No tax on labor	\$16.00
15983	4/ 5/68	Parts: Switch 4.56 Ball 17.42 Elbow 34.99 Tax 3.42	\$60.39
15889	3/28/68	(Work done in White Truck Company of Baton Rouge, La.) Parts: .80 Labor: 12.50 Phone calls: 1.32 P & M Material .50 Tax .60	\$15.72
17136	6/22/68	Parts: Clamp 3.34 Tax .20	\$3.54

  
**WHITE**



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SALES • SERVICE

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TRUCKS • SERVICE • PARTS • ACCESSORIES

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PRESIDENT

## CONTINUED STATEMENT OF ACCOUNT

of

W. L. ROBERTS

<u>Invoice</u>	<u>Date</u>	<u>Items</u>	<u>Total</u>
9027	6/8/68	Repair work performed by Cummins Rio Grande, El Paso, Texas. Labor: \$ 64.65 Parts: 21.66 Supplies: 11.00 Tax: 1.31	\$98.62
9776	9/20/68	Parts: Injectors*(8) @ \$25.00 each -200.00 Bolts,nuts 4.00 Tune engine - install injectors Labor: 40.00 Tax: 12.24	256.24
18333	9/16/68	Parts: Panels (2) @ 10.31 each 20.62 Tax: 1.24	21.86
16596	5/14/68	Parts: Clutch assembly 100.00	100.00
20011	12/30/68	Two Phone call to Odessa, Texas	5.87
21187	3/13/69	Work done on Invoice 10899 Labor: 31.45	31.45
21030	3/3/69	Two Phone calls to Odessa, Texas 16.78	16.78

  
**WHITE**



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H. J. BERT TOOLE  
PRESIDENT

## CONTINUED STATEMENT OF ACCOUNT

of

W. L. ROBERTS

<u>Invoice</u>	<u>Date</u>	<u>Items</u>	<u>Total</u>
22848	6/18/69	Repairs done in West Texas Truck Sales(White) Labor: 2450.00 Tax: 147.00	\$2597.00


\* \* \* \* \*

The attached checks numbered 1022 and 2016, payable to the First National Bank of Mobile, were notes payable to that bank by W.L. Roberts firstly, and endorsed by us:

Check #1022	March 10, 1969	\$329.76
Check #2016	July 14, 1969	1,028.44

\* \* \* \* \*

WE HEREBY CERTIFY THIS TO BE, TO THE BEST OF OUR KNOWLEDGE, A TRUE AND CORRECT STATEMENT OF THE ACCOUNT OF W. L. ROBERTS OF ROBERTSDALE, ALABAMA.

By   
Mobile White Autocar Company, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 14 DAY OF Oct., 1969.

  
NOTARY PUBLIC





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 W. L. ROBERTS 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 W. L. ROBERTS, Defendant, by MOBILE WHITE AUTOCAR COMPANY, INC., a Corporation, Plaintiff.

WITNESS my hand this 30 day of Oct, 1969.

Alice J. Duck (Clerk)  
ALICE J. DUCK

MOBILE WHITE AUTOCAR COMPANY, INC., X  
a Corporation,

Plaintiff,

VS.

W. L. ROBERTS,

Defendant.

X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA,  
X AT LAW.  
X 70-8961  
X

C O M P L A I N T

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

Debtor may be located at:

D & L Trucking Company, Inc.  
Robertsdale, Alabama 36567

**FILED**

OCT 30 1969

**ALICE J. DICK** CLERK  
REGISTER

Returned 4 day of Nov 1969  
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff  
Deputy Deputy Sheriff

By \_\_\_\_\_

Received 30 day of Oct 1969  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

I served a copy of the within AKC  
on W. L. Roberts

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

By \_\_\_\_\_  
TAYLOR WILKINS, Sheriff

By \_\_\_\_\_  
D. S.

~~Jackson~~  
Lacal miss

W. L. Roberts

VS

Mobile White Autocar Co  
Inc

8961 Lolly

ALICE J. DUCK  
CLERK  
REGISTER

FILED  
OCT 30 1969

E. K. R.

11/17

11/17

11/17



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521 BEAUREGARD STREET

P. O. DRAWER 1885

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MOBILE, ALABAMA 36601



TRUCKS • SERVICE • PARTS • ACCESSORIES

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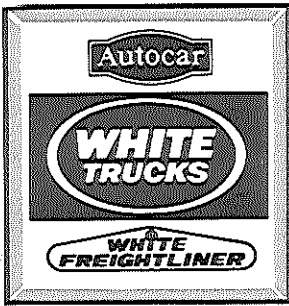
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## CONTINUED STATEMENT OF ACCOUNT

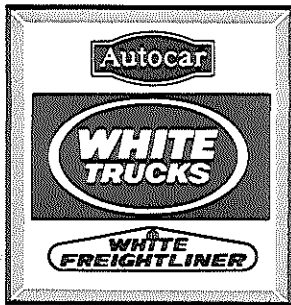
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By H. J. Bert Toole  
Mobile White Autocar Company, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME THIS 14th DAY OF Oct., 1969.

Bill R. [Signature]  
NOTARY PUBLIC

