

RICHARD C. LACEY

Attorney-At-Law

P. O. DRAWER A-J
FAIRHOPE, ALABAMA 36532

TELEPHONE 928-2373

January 13, 1970

Mrs. Alice J. Duck
Circuit Court Clerk
Baldwin County Court
Bay Minette, Alabama 36507

Re: Rudolph Ramelli, Inc. a Corporation,
vs. P. E. McIntosh, d/b/a Peerless
Cleaners.

9639

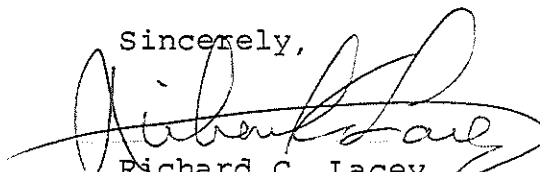
Dear Mrs. Duck:

Please file the enclosed papers on the above subject case.

The Defendant can be served at W B C A Radio Station, Bay Minette, Alabama.

Thank you.

Sincerely,



Richard C. Lacey

RCL:jbp

Enclosures

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

} No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonP...E...MCINTOSH...divididually.....
..and..d/b/a PEERLESS CLEANERS,.....
.....Defendant.....

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...P...E...MC-
...TOSH, individually and d/b/a PEERLESS CLEANERS,..... Defendant.....

byRUDOLPH RAMELLI, INC., a Corporation,.....
.....Plaintiff.....

Witness my hand this.....15.....day of.....19..71

Alice J. Luck
Clerk

No. 9629

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

RUDOPH RAMELLI, INC., a

corporation,

Plaintiffs

vs.

P. E. MCINTOSH, individually

and d/b/a Peerless Cleaners, Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JAN 15 1971

Clerk

ALICE J. DUCK

CLERK
REGISTER

RICHARD C. LACEY

Plaintiff's Attorney

Defendant's Attorney

works
Defendant ~~xxx~~ at

W B C A Radio Station

Bay Minette, Alabama
Received In Office

Jan 15 1971

Taylor Wilkins Sheriff

I have executed this summons

this Jan 21 1971

by leaving a copy with

T

P. E. McIntosh

..... Sheriff claims 0 miles at

..... Ten Cents per mile Total \$.....

TAYLOR WILKINS, Sheriff

BY Talbot
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

RUDOLPH RAMELLI, INC., a
corporation,

Plaintiff,

VS.

P. E. MCINTOSH, individually
and d/b/a PEERLESS CLEANERS,

Defendant.

* IN THE CIRCUIT COURT OF BALDWIN
* COUNTY, ALABAMA.

* IN EQUITY

* CASE NO. 9639

*

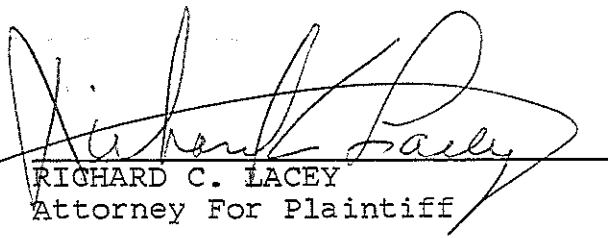
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BILL OF COMPLAINT

I. The Plaintiff claims of the Defendant the sum of
THREE HUNDRED FIFTY-ONE AND 12/100 (\$351.12) DOLLARS due from
him on account, to-wit; the 26th day of September, 1969, which
sum of money with the interest thereon is still unpaid.

2. The Plaintiff claims of the Defendant the sum of
THREE HUNDRED FIFTY-ONE AND 12/100 (\$351.12) DOLLARS, due
from him for merchandise, goods and chattels sold by the
Paintiff to the Defendant on to-wit; the 26th day of September,
1969, which sum of money with the interest thereon is still
unpaid.


RICHARD C. LACEY
Attorney For Plaintiff

Defendant may be served at;

W B C A Radio Station
Bay Minette, Alabama

There is attached hereto as Exhibit "A" and made
a part hereto an itemized statement of account verified by
R. C. PURDY, a competent witness, sworn to before a Notary
Public, which statement shows the amount due on this account
as of the 26th day of September, 1969.

FILED

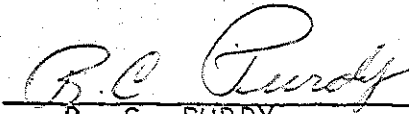
JAN 15 1971

ALICE J. DUCK CLERK
REGISTER


AFFIDAVIT TO ACCOUNT

STATE OF LOUISIANA)
PARISH OF ORLEANS)
CITY OF NEW ORLEANS)

This day personally appeared before me,
the undersigned authority, a Notary Public in and for
said City, Parish and state, R. C. PURDY, who first
being by me duly sworn, upon oath says that he is the
Credit Manager of RUDOLPH RAMELLI, INC. and authorized
and empowered to make this affidavit for and in its
behalf; that he is familiar with the books of account
and all transactions pertaining thereto; that the
attached itemized statement of account in favor of
RUDOLPH RAMELLI, INC., creditor, and against P. E.
McIntosh d/b/a Peerless Cleaners
debtor, in the amount of \$ 351.12,
is true and correct, and due and owing by the said
P. E. McIntosh d/b/a Peerless Cleaners,
debtor, to the said RUDOLPH RAMELLI, INC., creditor;
that no part of said amount of \$ 351.12
has been paid; and that there are no set-offs or
counter-claims thereto.


R. C. PURDY

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 14th
DAY OF December, 1970


NOTARY PUBLIC