


DEAS TIRE COMPANY, a corpora-	)	IN THE CIRCUIT COURT OF
tion,	)	BALDWIN COUNTY, ALABAMA
Plaintiff	)	
VS	)	AT LAW
JAMES TAYLOR, d/b under the Trade )		
Style "TAYLORS 66 STATION"	)	
Defendant	)	CASE NUMBER: <u>9684</u>

Plaintiff claims of the defendant Two Hundred Three (\$203.00) Dollars and fifty-eight (58¢) cents, due from him by account on, August 31, 1970, which sum of money with the interest thereon is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

  
 Dan Benton,  
 Attorney for Plaintiff

Serve the defendant at  
 Taylor's 66 Station,  
 Robertsdale, Alabama

FILED

FEB 11 1971

LEONIDE B. BLACKMON CIRCUIT CLERK

# STATEMENT OF ACCOUNT

Creditor Deas Tire Company, Inc.

Debtor James Taylor dba Taylors 66 Address Robertsdale, Alabama 36567  
Stations

Employment \_\_\_\_\_ Address \_\_\_\_\_

Professional Services Rendered On Account \$ ~~203.58~~

Merchandise, Goods, Sold and Delivered On Account \$ 203.58

Date of Last Charge Aug 31, 1970

Date of Last Payment Sep. 3, 1970

## SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

DEAS TIRE COMPANY, INC.  
2901 GOVERNMENT BOULEVARD  
MOBILE, ALABAMA 36606  
471-1571

X

*James E. Taylor*  
Affiant

Sworn and subscribed to before me this  
28 day of Jan 1971

*[Signature]*  
Notary Public

My Commission Expires MY COMMISSION EXPIRES OCT. 27, 1971

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9684

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES TAYLOR, d/b under the Trade Style  
"TAYLORS 66 STATION",

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 JAMES  
TAYLOR/ d/b under the Trade Style, "TAYLORS 66 STATION", Defendant.....  
by DEAS TIRE COMPANY, a Corporation.

....., Plaintiff.....

Witness my hand this 11 day of Feb 19 71

Eunice B. Blackmon Clerk  
EUNICE BLACKMON

No. 9684

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DEAS. TIRE COMPANY, a

Corporation,

Plaintiffs

vs.

JAMES TAYLOR d/b under the  
Trade Style, "TAYLORS 66 STATION"

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

FEB 11 1971

Clerk

LUNICE B. BLACKMON CIRCUIT  
CLERK

DANIEL A. BENTON,

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Feb 11 1971

(Taylor Wilkins) Sheriff

I have executed this summons

this 12 Feb 1971

by leaving a copy with

BR

James Taylor

Sheriff claims 50 miles at

per 5.00 Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY BROWN  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. B. Brown Deputy Sheriff

50 mi RT  
R-Dale

DEAS TIRE COMPANY, a corporation	X	IN THE CIRCUIT COURT OF
PLAINTIFF	X	BALDWIN COUNTY, ALABAMA
VS	X	AT LAW
JAMES TAYLOR, d/b under the Trade Sytle "TAYLORS 66 STATION"	X	
DEFENDANT	X	CASE NO: 9 6 8 4
	X	
		PLEA

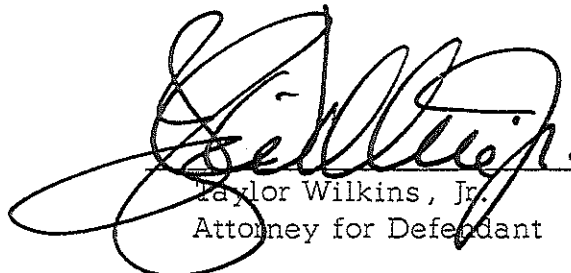
Comes now the defendant, James Taylor, separately and severally,  
and files this plea to the plaintiff's complaint and each count thereof separately  
and severally:

I.

Not Guilty

II.

The defendant denies each and every allegation of the plaintiff's  
complaint and each count thereof and demands strict proof of the same.

  
Taylor Wilkins, Jr.  
Attorney for Defendant

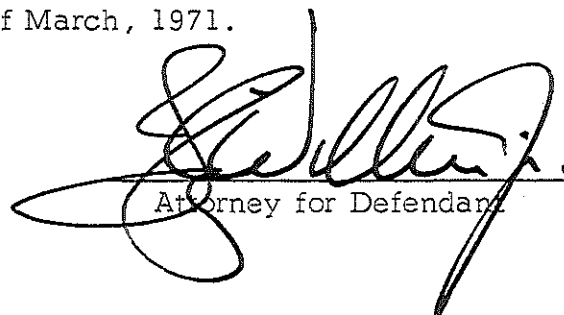
I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have  
on this the 11th day of March, 1971, forwarded a true and exact copy of the  
foregoing plea to Mr. Daniel A. Benton, attorney of record for the Plaintiff,  
by mailing the same in the United States Post Office, properly addressed, with  
the postage paid thereon.

DONE this the 11th day of March, 1971.

**FILED**

**MAR 11 1971**

**EUNICE B. BLACKMON** CIRCUIT  
CLERK

  
Attorney for Defendant

LAW OFFICES  
RICKARBY & BENTON

ATTORNEYS AT LAW  
55 SOUTH SECTION STREET  
P. O. BOX 471  
FAIRHOPE, ALABAMA 36532

TELEPHONE  
(205) 928-2308

E. G. RICKARBY  
DANIEL A. BENTON

February 8, 1971

Mrs. Eunice Blackmon  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

Inre: Deas Tire Company, a Corporation  
versus James Taylor d/b under the  
Trade Style, "Taylors 66 Station"  
File #B71-28

Enclosed find Summons & Complaint in the above  
styled cause. Please process.

Yours very truly,



DANIEL A. BENTON  
Attorney at Law

DAB/jc  
Encl.  
3-12-71