

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10557

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonGRADY DAUGHTRY.....

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.....

.....GRADY DAUGHTRY....., Defendant.....

by DENNIS MADDEN, dba J & M STANDARD SERVICE.....

.....Plaintiff.....

Witness my hand this.....18.....day of.....Aug.....1972

Eunice B. Blackburn, Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DENNIS MADDEN, dba J & M.....

STANDARD SERVICE

Plaintiffs

vs.

GRADY DAUGHTRY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

FILED

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

RICKARBY & BENTON
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant ~~lives~~ at works at

Baldwin County Animal Clinic
Summerdale, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

DENNIS MADDEN, dba J & M STANDARD
SERVICE,

Plaintiff

vs.

GRADY DAUGHTRY,

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) CASE NO. 10557

)

C O M P L A I N T

COUNT I

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him by account on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement of account filed herewith.

COUNT II

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him by account on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid.

COUNT III

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him for merchandise, goods and chattels sold to the defendant on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid.

COUNT IV

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him for work and labor done for the defendant by the plaintiff on, to-wit, the 2nd day of December, 1971, at the defendant's request, which sum of money with interest thereon is still unpaid.

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Defendant may be served at
his place of employment:

Baldwin County Animal Clinic
Summerdale, Alabama


DANIEL A. BENTON, Attorney for Plaintiff

Phone 947-3431

Date _____

19

Sold to

Address

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

[illegible]

XAP-58

All claims and returned goods **MUST** be accompanied by this bill.

7591

Salesman

Received By

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair

Complete Car Care

P. O. Box 62

Silverhill, Ala. 36576

Phone 947-3431

Customer's
Order No.

Date

19

Sold to

Address

MDSE. SOLD				MDSE. RET'D.				RECD. ON ACCT.-NOTE		MISC'L		PAID OUT	
CASH		CHARGE		CASH		CREDIT							
QUAN.	NUMBER			ARTICLES				PRICE				AMOUNT	
1	174			1/2" front hub				7.				7.00	
4	241			lower clamps				43				1.72	
4	242			lower clamps				65				2.60	
1				can radiator flush				160				1.60	
1				can radiator stop rust				125				1.25	
1				set up points				275				2.75	
1				condensor				190				1.90	
6	gts oil			10W 40				90				5.40	
1	PF-2			oil filter				423				4.23	
1				throw out bearing				900				9.00	
1	151			belt				380				3.80	
1	A171 C			dry filter				458				4.58	
1	CV-688			PCV				67				.67	
1	CV-745			PCV valve				265				2.65	
												46.65	

XAP-58

All claims and returned goods MUST be accompanied by this bill.

7590

Salesman

Received By

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair
Complete Car Care
P. O. Box 62
Silverhill, Ala. 36576
Phone 947-3431

Customer's
Order No.

Date

1971

Sold to

Address

MDSE. SOLD				MDSE. RET'D.				RECD. ON ACCT.-NOTE		MISC'L		PAID OUT	
CASH		CHARGE		CASH		CREDIT							
QUAN.	NUMBER			ARTICLES				PRICE				AMOUNT	
1				oil pump				24.99				24.99	
1				oil pump				28.11				28.11	
1				oil pump				21.20				21.20	
1				full retail gaskets				19.15				19.15	
1				Deming Chain				11.30				11.30	
1	709165			clutch disc				22.11				22.11	
1	849351			oil pump				16.00				16.00	
1				harmon thermostat				3.85				3.85	
1	7355			hose				2.95				2.95	
1	7214			hose				4.50				4.50	
6	71641			lights				144				1.44	
				Rebuild both heads				28.00				28.00	
16				valve stems ground to proper length								5.60	
1				oil motor mounts				12.00				12.00	
												211.25	

XAP-58

All claims and returned goods MUST be accompanied by this bill.

7589

Salesman

Received By

Phone 947-3431

Date _____

19

XAP-58

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

Used Cars & Auto Repair
Complete Car Care
P. O. Box 62
Silverhill, Ala. 36576
Phone 947-3431

Date _____

17 19

Sold to

Address

[illegible]

XAP-58

All claims and returned goods **MUST** be accompanied by this bill.

9152 Salesman

Received By

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

AFFIDAVIT OF ITEMIZED ACCOUNT

STATE OF Alabama)

COUNTY OF Baldwin)

Before me, the undersigned Notary Public, in and for said County, and State, personally appeared DENNIS MADON,
(Affiant)

who, being by me duly sworn, deposes and says, that he is the

OWNER
(Officer of company, president, secretary, etc.) for the firm

of STANDARD SERVICE; that he has knowledge
(Name of company)

of the annexed statement of account of said firm against Conly

Daugherty
(Debtor) and that it is just, true and correct;

that there is now due on said account, the sum of \$ 125.65,

with interest from the 2nd day of December, 1971,

after allowing all just credits.

Dennis E. Madon
Affiant

Sworn to and subscribed before me on
this the 25 day of July, 1972.

L. Dwight Bowman
Notary Public

Affix Seal:

FILED

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Section 378 of Title 7
Code of Alabama

DENNIS MADDEN, dba J & M STANDARD SERVICE,) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
Plaintiff) AT LAW
vs.)
GRADY DAUGHTRY,) CASE NO. <u>10557</u>
Defendant)

C O M P L A I N T

COUNT I

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him by account on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement of account filed herewith.

COUNT II

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him by account on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid.

COUNT III

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him for merchandise, goods and chattels sold to the defendant on, to-wit, the 2nd day of December, 1971, which sum of money with interest thereon is still unpaid.

COUNT IV

The plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY-FIVE AND 65/100 DOLLARS (\$125.65) due him for work and labor done for the defendant by the plaintiff on, to-wit, the 2nd day of December, 1971, at the defendant's request, which sum of money with interest thereon is still unpaid.

FILED

AUG 18 1972


DANIEL A. BENTON, Attorney for Plaintiff

EUNICE B. BLACKMON CIRCUIT CLERK

Defendant may be served at his place of employment:

Baldwin County Animal Clinic
Summerdale, Alabama

This Instrument Was
Prepared By
DANIEL A. BENTON
Attorney At Law
Box 471
Fairhope, Ala. 36532

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair

Complete Car Care

P. O. Box 62

Silverhill, Ala. 36576

Phone 947-3431

Customer's

Order No.

Date

1971

Sold to

Address

MOSE. SOLD				MOSE. RET'D.				RECD. ON ACCT.-NOTE		MISC'L		PAID OUT	
CASH		CHARGE		CASH		CREDIT							
QUAN.	NUMBER			ARTICLES				PRICE				AMOUNT	
1	11-346			1000 bit									
1	10 F			1000 pull off				400				400	
1	1000			1000				700				700	
10	1000			1000 gas pulse				65				650	
1	1000			1000 273 engine				19.5		lower		11400	
				at 6.00 hour								11400	
1	1000			1000 cylinder bit				75				7500	
1	1000			1000 bit				100				100	
2	1000			1000 break fluid				75				150	

XAP-58

All claims and returned goods MUST be accompanied by this bill.

7591

Salesman

Received By

Brady Daugherty

Ard's Printing Company., Robertsdate, Alabama 36567 68728-9

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair

Complete Car Care

P. O. Box 62

Silverhill, Ala. 36576

Phone 947-3431

Customer's

Order No.

Date

19

Sold to

Address

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

QUAN.	NUMBER	ARTICLES	PRICE	AMOUNT
10	1/2	1/2 in. 255 tires	40	400
4	7/16	4 in. 255 tires	43	172
4	2 1/2	4 in. 255 tires	65	260
1		can radiator flush	160	160
1		can radiator stop rust	125	125
1		set of 2	275	275
1		can of 2	190	190
6		6 qts oil 10W/40	90	540
1		1 PF-2 oil filter	1123	1123
1		1 H-171 oil filter	900	900
1		1 151 belt	350	350
1		1 H-171 oil filter	458	458
1		1 CV-638 PCV	67	67
1		1 CV-745 PCV	265	265

XAP-58

All claims and returned goods MUST be accompanied by this bill.

7590

Salesman

Received By

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair
Complete Car Care
P. O. Box 62
Silverhill, Ala. 36576
Phone 947-3431

Customer's
Order No.

Date

1971

Sold to

Address

MDSE. SOLD		MDSE. RET'D.		RECD. ON ACCT. - NOTE	MISC'L	PAID OUT
CASH	CHARGE	CASH	CREDIT			
QUAN.	NUMBER	ARTICLES		PRICE	AMOUNT	
		Valve grinding		21.20	21.20	
1		Valve grinding		21.20	21.20	
1		Valve grinding		21.20	21.20	
1		Valve grinding		21.20	21.20	
1		Valve grinding		21.20	21.20	
1	709163	Clutch discs		22.11	22.11	
1	849351	oil pump		16.00	16.00	
1		hose		3.85	3.85	
1	7214	hose		2.95	2.95	
6	71641	lights		4.50	4.50	
16		valve stem ground to proper length		23.00	23.00	
1		rot motor mounts		12.00	12.00	

XAP-58

All claims and returned goods MUST be accompanied by this bill.

7589

Salesman

Received By

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

Grady Daugherty

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair

Complete Car Care

P. O. Box 62

Silverhill, Ala. 36576

Phone 947-3431

Customer's

Order No.

Date _____

19

Sold to

Address

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

[illegible]

XAP-58

All claims and returned goods **MUST** be accompanied by this bill.

7599

Salesman

Received By

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

RILEY'S STANDARD SERVICE

Used Cars & Auto Repair

Complete Car Care

P. O. Box 62

Silverhill, Ala. 36576

Phone 947-3431

Customer's

Order No.

Date _____

Sold to

Address

[illegible][illegible]

XAP-58

All claims and returned goods **MUST** be accompanied by this bill.

9152

Salesman

Received By

Ard's Printing Company., Robertsdale, Alabama 36567 68728-9

AFFIDAVIT OF ITEMIZED ACCOUNT

STATE OF Alabama)

COUNTY OF Baldwin)

Before me, the undersigned Notary Public, in and for said County, and State, personally appeared David E. Madden,
(Affiant)

who, being by me duly sworn, deposes and says, that he is the

Owner for the firm
(Officer of company, president, secretary, etc.)

of J. M. Standard Service; that he has knowledge
(Name of company)

of the annexed statement of account of said firm against Frank

Townsend and that it is just, true and correct;
(Debtor)

that there is now due on said account, the sum of \$ 45.00,

with interest from the 28th day of October, 19 71,

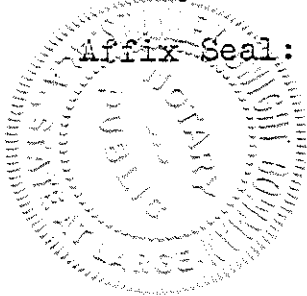
after allowing all just credits.

David E. Madden
Affiant

Sworn to and subscribed before me on
this the 25 day of July, 1972.

L. Dwight Bowman
Notary Public

Affix Seal:



FILED

AUG 18 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

Section 378 of Title 7
Code of Alabama

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,557

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~GRADY DAUGHTRY~~.....

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.....

.....GRADY DAUGHTRY..... Defendant.....

by DENNIS MADDEN, dba J & M STANDARD SERVICE.....

..... Plaintiff.....

Witness my hand this 18..... day of Aug..... 1972

Eunice B. Blackmon Clerk

No. 10577

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DENNIS MADDEN, dba J & M

STANDARD SERVICE

Plaintiffs

VS.

GRADY DAUGHTRY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

FILED

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

RICKARBY & BENTON
Fairhope, Alabama

RECEIVED
PL

Plaintiff's Attorney

4-18-1975

Defendant's Attorney

TAYLOR WILKINS

Defendant lives at works at

Baldwin County Animal Clinic
Summerdale, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Grady Haughton

27 Sept 32
W. B. Brown

Sheriff

Deputy Sheriff

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2508

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
516 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

August 15, 1972

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

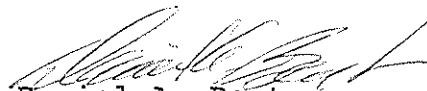
Re: Dennis Madden, dba J & M Standard
Service v. Grady Daughtry

Dear Mrs. Blackmon:

Enclosed are suit papers in the above-styled matter. Please process.

Thank you.

Yours very truly,


Daniel A. Benton

DAB:w
Enc.

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

June 7, 1973

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

Re: Dennis Madden dba J&M Standard Service
v. Grady Daughtry
Case No. 10,557, at Law

Dear Judge Mashburn:

We request that the above-styled case be dismissed as we have been unable to obtain service of process on the defendant in this matter.

The case is set for the week of June 11.

Respectfully submitted,


Daniel A. Benton

DAB:w
cc-Clerk of the Circuit Court

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

February 28, 1973

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: Dennis Madden dba J&M Standard Service
v. Grady Daughtry
Case No. 10,557, at Law

Dear Judge Mashburn:

This matter is set for disposition on the docket sheet for Tuesday, March 13, 1973, but I call to your attention the fact that the defendant has never been personally served with service of process. I, therefore, respectfully request that this case be passed, giving us one more opportunity to obtain service of process in this matter.

Respectfully submitted,

Daniel A. Benton

DAB:w
cc-Mrs. Eunice Blackmon
Clerk of the Circuit Court
cc-Mrs. Dennis Madden

142.85

46.65

211.25

250.00-

25.00-

125.75T