

SUMMONS

2361

BOOK 001 PAGE 441

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon EUGENE A. KOEHLE d/b/a KOEHLE MOTOR COMPANY, 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, Alabama, at Bay Minette, against EUGENE A. KOEHLE, d/b/a KOEHLE MOTOR COMPANY, by HANK DOUGLASS MOTORS.

Witness my hand this the 19th day of August, 1954.

W. J. Jones
Clerk

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COMPLAINT

HANK DOUGLASS MOTORS,
Plaintiff

VS:

EUGENE A. KOEHLE d/b/a KOEHLE
MOTOR COMPANY,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I

The Plaintiff claims of the Defendant the sum of SIX THOUSAND & 00/100 DOLLARS (\$6000), together with interest thereon, due from them by account on, to wit: the 16th day of August, 1954, which sum of money with interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of SIX THOUSAND & 00/100 DOLLARS (\$6000), together with interest thereon, due from them on account stated between the Plaintiff and the Defendant on, to wit: the 16th day of August, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of SIX THOUSAND & 00/100 DOLLARS (\$6000), together with interest thereon, due from them for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 16th day of August, 1954, which sum of money with interest thereon, is still unpaid.

There is attached to the original and one copy hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a Notary Public, which shows the amount due on this account as of the 16th day of August, 1954.

W. J. Jones
Attorney for Plaintiff

STATE OF FLORIDA,)
Walton COUNTY.)

A. G. DOUGLASS, JR. first being sworn deposes and says as follows:

I am the president of the HANK DOUGLASS MOTORS and on July 9, 1954 we sold EUGENE A. KOEHLE, as owner of KOEHLE MOTOR COMPANY of Foley, Alabama all of this company's Dodge and Plymouth parts, signs, accessories and special tools, metal parts bins and various other incidental items such as desks, motors, etc., that EUGENE A. KOEHLE gave us a check dated July 9, 1954 of the Farmers & Merchants Bank of Foley, Alabama in the amount of FIVE THOUSAND & 00/100 DOLLARS (\$5000), that said check was not paid when presented at said bank and that EUGENE A. KOEHLE promised to pay the balance of \$1000 on the 15th of July, 1954, which he has failed to do. Accordingly, EUGENE A. KOEHLE d/b/a Koehle Motor Company owes us a total of \$6000 after all just credits have been accounted for.

A. G. Douglass, Jr.
A. G. Douglass, Jr.

Sworn to and subscribed before me a Notary Public on this the 16th day of August, 1954.

Syble Neel
Notary Public at large
My commission expires Dec. 23, 1957.
Bonded by American Surety Co. of N. Y.

FILED

8-19-54

ALICE J. DUCK, Clerk

001 442

Received in this
this 19 day of Aug, 1954
TAYLOR WILKINS, Sheriff

Received 29 day of Aug, 1954
and on 20 day of Aug, 1954
I served a copy of this with
on George A. Koehle
By service on Eugene H. Koehle
TAYLOR WILKINS, Sheriff
By Geo. A. Koehle D.S.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

HANK DOUGLASS MOTORS,
Plaintiff

VS:

EUGENE A. KOEHLE d/b/a KOEHLE
MOTOR COMPANY,
Defendant

FILED
AUG 10 1954
AUG 1. QUICK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA