

ELLIOTT G. RICKARBY

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

July 22, 1955

2677

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

Dear Mrs. Duck:

Inre: Trailmobile, Inc.

vs

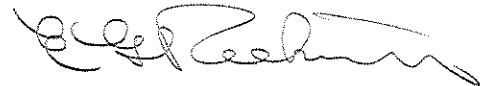
Hubert N. Johnson

Our File: 3363

With this we are handing you Summons and Complaint
in the above case, and our check in the sum of
\$15.00 for the costs.

Please process and oblige.

Yours very truly,



EGR/fm

Encl.

cc: Borsch and Murphy
dupl.

A. S. Whiting

TRAILMOBILE, INC.,
A corporation

PLAINTIFF

VS

HUBERT N. JOHNSON

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant FIVE HUNDRED EIGHTY-FOUR DOLLARS AND SEVENTY-FIVE CENTS (\$584.75) due from him by account on, to-wit, the 18th day of November, 1954, which sum of money with interest thereon is still unpaid.

COUNT II


The Plaintiff claims of the Defendant ONE HUNDRED NINETEEN DOLLARS AND FIFTY-FOUR CENTS (\$119.54) due from him for work and labor done for the Defendant by the Plaintiff on, to-wit, the 11th and 13th days of August, 1954, which sum of money with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant FOUR HUNDRED SIXTY-FIVE DOLLARS AND TWENTY-ONE CENTS (\$465.21) due by promissory note made by him on, to-wit, the 17th day of April, 1954, and payable on, to-wit, the 17th day of October, 1954, with interest thereon; and the Plaintiff avers that as part of the consideration in this transaction the Defendant waived all his right of exemptions as to the collection of this debt and agreed to pay attorney's fee, if placed with an attorney for collection after maturity, which the Plaintiff further claims in the sum of NINETY-THREE DOLLARS AND FOUR CENTS (\$93.04).

RICKARBY AND RICKARBY

BY


Attorney for Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.

RICKARBY AND RICKARBY

BY


Attorney for Plaintiff

TRAILMOBILE, INC.,
A corporation,

Plaintiff,

VS.

HUBERT N. JOHNSON,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 2677

P L E A S.

Comes now the defendant in the above styled cause, and,
for answer to the complaint heretofore filed in said cause
and to each and every count thereof, separately and severally,
says:

1.

The allegations of the complaint are untrue.

2.

That he has paid the debt, for the recovery of which this
action was brought, before the action was commenced.

J. J. N. Maschbauer, Jr.
Attorney for Defendant.

The Defendant demands a jury
trial of this cause

J. J. N. Maschbauer, Jr.
Attorney for Defendant