

McDERMOTT & PFLEGER

ATTORNEYS AT LAW

304-306 STAPLES-PAKE BUILDING

MOBILE, ALABAMA

WM. V. McDERMOTT
SYDNEY S. PFLEGER

July 18, 1956

2979

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

Dear Mrs. Duck:

I hand you herewith the complaint of Ray-Brooks Machinery Company, Inc. against J. F. Sims, which I would appreciate your filing in your Court. I have written the address of the defendant at the bottom of the page which is Rabun, Alabama.

Your courtesy in the matter is more than appreciated.

Very truly yours,

McDERMOTT & PFLEGER

BY:

Sydney S. Pfleger

SSP/nh

Encl:

RAY-BROOKS MACHINERY CO. INC.,
a corporation,

Plaintiff

Versus

J. F. SIMS,

Defendant

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

NO. _____

COUNT ONE

The Plaintiff claims of the Defendant the Sum of \$342.28 due from the Defendant for materials, work and labor, furnished the Defendant by the Plaintiff, at the Defendant's request from to-wit March 26, 1956, through March 30, 1956, which sum of money with interest thereon since March 30, 1956, is still due and unpaid.

The Plaintiff further avers that the materials, work and labor, as referred to hereinabove was for the repairing of an International TD-9, Serial No. 48924.

And the Plaintiff further avers that it claims a lien against said motor vehicle for the materials, work and labor performed by the plaintiff on said motor vehicle for the Defendant as aforesaid.

A verified itemized statement of the account is attached hereto and made a part hereof.

The Plaintiff further shows unto this Court that the Defendant did on to-wit the 30th day of March, 1956, pay to the Plaintiff the Sum of \$313.11 and that the balance of the \$342.28 stills remains due and unpaid.

McDERMOTT & PFLEGER

BY: *Sydney S. Pfleger*
Attorneys for Plaintiff

Defendant's Address:

Rabun, Alabama

INVOICE

RAY - BROOKS MACHINERY COMPANY, INC.

Road Building and Maintenance Machinery

Pensacola, Florida
2300 Navy Boulevard

P. O. BOX 367

MOBILE, ALABAMA

TELEGRAPH ROAD

Montgomery, Alabama
2275 W. Fairview Avenue

MAIL INVOICE

ACCOUNT OF

J. F. Sims
Bay Minette, Alabama

Same

SHIPPED TO

Same

Customer Order	Salesman	Date Shipped	Shipped From	Via	Invoice Date	Terms	Invoice No.
	Mobile	3-26-56	Mobile, Ala.	call for	3-28-56	Shop #	929 914

Quantity	Description	Price	Total
	INTERNATIONAL TD-9, Serial #48924		
2	263-434-R91 Bushing	5.40	\$ 10.80
4	273-577-R91 Seal	1.54	6.16
4	263-417-R1 Felt	.36	1.44
2	269-412-R91 Shaft	31.94	63.88
2	272-648-R91 Double Flange Roller	64.20	128.40
3	272-647-R91 Single Flange Roller	56.71	170.13
3	53370-D Shaft	20.97	62.91
3	53372-D Bushing	2.81	8.43
3	53369-D Washer	.89	2.67
6	53362-D Retainer	1.04	6.24
6	264-745-R91 Seal	1.57	9.42
6	53539-D Felt	.23	1.38
6	53361-D Felt	.73	4.38
6	53360-D Felt	.56	3.36
32	1/2 x 1 3/4 Bolt, Lock and Nut	.20	6.40
1	257-867-R91 Element		1.43
1	62946-D Element		1.20
1	266-839-R91 Element		2.10
1	13841-D Gasket		.18
2	13728-D Gasket	.13	.26
10	37290-D Lubricator	44.00	4.40
2	263-945-R91 Lock Wire	.07	.14
2	53250-D M/Pin	3.79	7.58
			\$ 503.29
	To check bottomrollers, replace as needed. To turn Pins and Bushings, to repair Front Idlers.		137.00
	Sales Tax		15.10
			\$ 655.39
	Paid, March 30, 1956,		313.11
	Balance due		\$ 342.28

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2979

July

TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. F. SIMS

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

J. F. SIMS

, Defendant

by

RAY BROOKS MACHINERY CO. INC. A Corp.

, Plaintiff

Witness my hand this 19th. day of July 1956

Reice J. Drake, Clerk