

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon W. F. GODWIN, JR., Individually and doing business as BAY MINETTE RECAP SHOP, 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 W. F. GODWIN, JR., Individually, and doing business as BAY MINETTE RECAP SHOP, by RUBBER & TIRE MATERIALS CO. OF GEORGIA, INC., a Georgia Corporation.

Witness my hand this the 29 day of October, 1956.

*W. F. Godwin, Jr.*

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COMPLAINT

RUBBER & TIRE MATERIALS CO. OF )  
GEORGIA, INC., a Georgia )  
Corporation, )

PLAINTIFF )

VS: )

W. F. GODWIN, JR., Individually, )  
and doing business as BAY )  
MINETTE RECAP SHOP, )

DEFENDANT )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant TWO THOUSAND FIVE HUNDRED FIFTY & 00/100 DOLLARS (\$2,550), due by promissory note made by him on the 10th day of October, 1955, and payable on demand and in installments, with interest thereon.

Said note is a waive note and provides for reasonable attorney's fees, which plaintiff alleges to be \$432.50.

COUNT II:

The plaintiff claims of the defendant the following personal property, viz: One R3A Lodi Truck mold with 8-25-20 900-20 10.00-20 matrixs; One CR3 American Truck mold with matrixs; One F1 Lodi mold with matrixs; One C Lodi mold with matrixs; One Heinz Truck Sectional with air bags and matrixs; One Heinz Automobile Sectional with Air bags and Matrixs; One 6HP Boiler; One 2½ HP Compressor; One 2 HP Buffer; One 5 HP Buffer; and, One Large Truck Spreader, with the value of the hire or use thereof during the detention, viz: from the 27th day of October, 1956.

*W. F. Godwin, Jr.*  
Attorney for Plaintiff

W. 3077

Received 29 day of Oct 1956  
and on 6 day of Nov. 1956  
I served a copy of the within 80 C  
on \_\_\_\_\_

By service on W. F. Godwin

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.  
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SUMMONS AND COMPLAINT

RUBBER & TIRE MATERIALS CO OF  
GEORGIA, INC., A GEORGIA  
CORPORATION,

PLAINTIFF

VS:

W. F. GODWIN, JR., INDIVIDUALLY  
AND DOING BUSINESS AS BAY  
MINETTE RECAP SHOP,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 29 1956

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA