

LAW OFFICES  
**E. G. RICKARBY**  
BANK BUILDING  
FAIRHOPE, ALABAMA  
October 30, 1956

P. O. BOX 71

3078

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

Dear Mrs. Duck:

Inre: Gulf Engine & Eqpt. Co.  
Vs: M. Ard  
Our File: 3754

With this we are handing you Summons and Complaint  
in La Grave (Gulf Engine & Equipment Company) vs.  
M. Ard.

Please process and hand to the sheriff with the  
enclosed letter and oblige.

Yours very truly,



EGR/ts  
11-9-56  
Encl.

cc: Mr. Leo A. LaGrave

LEO A. LAGRAVE, individually  
and d/b/a GULF ENGINE AND  
EQUIPMENT COMPANY,

PLAINTIFF

VS

M. ARD

DEFENDANT

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALEWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and in answer to each  
county thereof separately and severally, says:

1.

Not guilty.

Wilters & Brantley

BY:

Attorneys for the Defendant

The defendant demands a trial by jury.

Wilters & Brantley

BY:

Attorneys for the Defendant

LEO A. LaGRAVE, individually )  
and doing business as )  
GULF ENGINE & EQUIPMENT COMPANY, )  
PLAINTIFF )  
VS. )  
M. ARD, )  
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 FOUR HUNDRED AND FORTY-SEVEN DOLLARS AND SEVENTEEN CENTS (\$447.17) due from him by account on the 21st day of June 1955; which sum of money with interest thereon is still unpaid.

COUNT II


The Plaintiff claims of the Defendant FOUR HUNDRED AND FORTY-SEVEN DOLLARS AND SEVENTEEN CENTS (\$447.17) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit: the 21st day of May, 1955, which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant FOUR HUNDRED AND FORTY-SEVEN DOLLARS AND SEVENTEEN CENTS (\$447.17) due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 21st day of June 1955, which sum of money with the interest thereon is still unpaid.

  
E. G. RICKARBY  
Attorney for Plaintiff

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

  
E. G. RICKARBY, Attorney for Plaintiff

STATE OF ALABAMA,  
BALDWIN COUNTY.

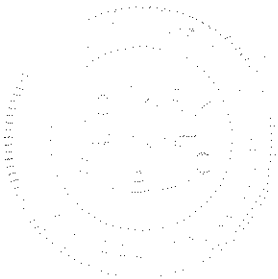
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Before me, the undersigned Notary Public, personally appeared Leo A. LaGrave, who, being duly sworn, deposes and says that he is Owner of Gulf Engine & Equipment Company, the owner of the attached account, and that the attached account is a correct statement of account between Gulf Engine & Equipment Company and M. Ard, and that there is owing for the said M. Ard to the said Gulf Engine & Equipment Company the sum of Four Hundred forty seven--17/100 (\$ 447.17 ), with interest from Sept. 30, 1955.

Leo A. LaGrave  
AFFIANT

Subscribed and sworn to before me on this the 26 day of Oct., 1956.

[Signature]  
Notary Public



# GULF ENGINE & EQUIPMENT CO.

DIESEL ENGINE SALES & SERVICE

PHONE HE 2-7513 403 NORTH ROYAL STREET P. O. BOX 1005

MOBILE 6, ALABAMA

TO M. Ard  
Robertsdale, Ala.

DATE 9-30-55

INVOICE NO. 1137 (A-Misc)

YOUR ORDER NO. Verbal

DATE OF ORDER 5-20-55

SHIPPED TO

VIA

TERMS Net 30 days

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PAGE  
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DATE	QUAN.		UNIT PRICE	AMOUNT
5-21-55		Install Rebuilt exchange Fuel Pump #NHL61350-2100 on Cummins Engine. Renew Fuel Filter Element. Charges to be billed on basis of repair to old fuel pump removed from your engine plus installation labor and freight.		
	1	BM26410 Governor Kit		55.00
	1	BM25132 Float Kit		15.30
	1	BM26998 Disc & Cover R-X		26.91
	1	BM20766 Suction Disc -RX		23.67
	1	BM20666 Bracket & Bushing Assy		10.73
	1	BM20668 Bracket & Bushing Assy		8.89
	1	BM28344 Cover & Check Assy		16.90
	1	BM24084 Gasket Set		3.60
	1	67655-2 Gear		12.75
	1	69638-1 Shaft		3.50
	1	69652 Bearing		1.77
	1	69822 Bearing		2.58
	1	67678 Shim		.25
	1	68077 Plate		.15
	1	70001 Pin		.50
	1	70002 Roller		2.10
	1	67683 "O" Ring		.05
	1	S-1027 Connection		.20
	3	S-16012-A Bearing	1.33	3.99
	2	S-10615-A Bearing	1.28	2.56
	2	S-16052 Bearing	1.85	3.70
	1	BM23311 Gear Pump		149.24
		Total Material		344.34
		3% Ala. Sales Tax		10.33
		Labor		88.00
		Freight Chgs		4.50
		ALL MERCHANDISE RETURNED SUBJECT TO 15% HANDLING CHARGE		447.17

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon M. ARD

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 M. ARD

....., Defendant .....

by LEO A. LaGRAVE, individually and doing business as

GULF ENGINE & EQUIPMENT COMPANY

....., Plaintiff.....

Witness my hand this 31 day of Oct 19 56....

Alice J. Duck, Clerk

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**THE STATE OF ALABAMA**  
**BALDWIN COUNTY****CIRCUIT COURT**

LEO A. LaGRAVE, ind. and  
doing business as  
GULF ENGINE & EQUIPMENT CO.  
Plaintiffs

vs.

M. ARD

Defendants

**SUMMONS and COMPLAINT****FILED**

Filed ..... , 19.....

OCT 31 1956

ALICE J. DUCK, Clerk

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

RECEIVED IN OFFICE

, 19.....

, Sheriff

I have executed this summons

this 11-2, 19 56

by leaving a copy with

M. ArdSheriff claims 50 miles atTen Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

Ellough Stoddard  
DEPUTY SHERIFFTaylor Wilkins SheriffEllough Stoddard Deputy SheriffRobertsdale, Ala