

LAW OFFICES  
E. G. RICKARBY  
BANK BUILDING  
FAIRHOPE, ALABAMA  
March 4, 1957

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

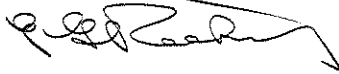
Dear Mrs. Duck:

In Re: Jackson Tractor Parts  
vs.  
Joe Lambert  
Case No. 3119  
Our File No. 3914

Request the above mentioned cause be dismissed at the request of the Plaintiff and ask that you figure up the cost, take them out of the deposit for cost and send a check for the difference.

I am making this request under authority of clients letter of February 21st, 1957.

Yours very truly,



EGR/r1  
c/c Dupl. Dun & Bradstreet  
c/c Mr. Joe Lambert  
Fairhope, Ala.

COUNTY OF.....HINDS.....

SG-188 (13743)

STATE OF.....MISSISSIPPI.....

Be it remembered, that on this.....14th.....day of.....December.....  
A. D., 19<sup>56</sup>., personally appeared before me, the undersigned authority,.....  
J. B. Guenther.....known to me

who being duly sworn, upon his oath stated that he is.....Manager.....  
of.....Jackson Tractor Parts Co., Inc. ....

{ a corporation organized and doing business under the laws of the State of Mississippi  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of.....

.....  
a sole trader doing business as.....  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said.....Jackson Tractor Parts Co., Inc. ....; that the attached account against

.....Joe Lambert.....of.....Fairhope, Alabama.....  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said.....Joe Lambert.....

at { ~~his~~  
~~their~~ } special instance and request, that credit has been duly given for all payments and  
his  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of.....Two Hundred Eighty-Four and 24/100.....Dollars  
(\$.....284.24.....) with interest from.....November 14.....1956..... is justly due and  
remains unpaid.

I hereby certify under my official seal that I am authorized as a Notary Public to  
administer oaths under the laws of the State of.....Mississippi.....  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

*Ruth Harris*  
Notary Public

County of.....Hinds.....State of.....Mississippi.....  
My commission expires.....December 22.....A. D. 19<sup>56</sup>.....

WIX FILTERS

## New and Used Parts

HIGHWAY 80 WEST  
JACKSON, MISS.

PHONES: DAY 2-6641  
NIGHT 2-6416

Ship To: D-6 D-7 Ship Via: Called For

**Invoice No. 2835**

SALES TAX

274 113

Received By: Signed By: J. M. Lambert

TOTAL

961

20426

JACKSON TRACTOR PARTS CO., INC.  
A Corporation,

PLAINTIFF

-vs-

JOE LAMBERT,

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 TWO HUNDRED AND EIGHTY-FOUR DOLLARS AND TWENTY-FOUR CENTS (\$284.24) due from him by account on the 14th day of October, 1956; which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claim of the Defendant TWO HUNDRED AND EIGHTY-FOUR DOLLARS AND TWENTY-FOUR CENTS (\$284.24) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 14th day of October, 1956; which sum of money with the interest thereon is still unpaid.

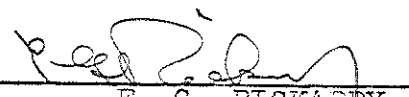
COUNT III

The Plaintiff claims of the Defendant TWO HUNDRED AND EIGHTY-FOUR DOLLARS AND TWENTY-FOUR CENTS (\$284.24) due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 14th day of October, 1956; which sum of money with the interest thereon is still unpaid.

BY

  
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

LAW OFFICES  
E. G. RICKARBY  
BANK BUILDING  
FAIRHOPE, ALABAMA  
December 21, 1956

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

Dear Mrs. Duck:

Re: Jackson Tractor Parts,  
Vs: Joe Lambert  
Our File: 3914

With this we are handing you Summons and Complaint,  
along with itemized and verified statement of account,  
in the above styled cause together with our check of  
\$20.00 deposit for costs.

Please process and oblige.

Yours very truly,



ts

Encl.

1-3-57

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOE LAMBERT

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 \_\_\_\_\_

JOE LAMBERT

Defendant .....

by JACKSON TRACTOR PARTS COMPANY, INC., A Corporation,

Plaintiff.....

Witness my hand this 2<sup>nd</sup> day of June 19 57

Berice Jensen Clerk