

THE ATMORE RECAP SHOP INC.,  
A CORPORATION

PLAINTIFF

VS

W. F. GODWIN

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

NUMBER:

3219

Comes the Defendant in the above styled cause and for answer to said complaint and to each count thereof separately and severally shows as follows:

1.

As to count one he denies the allegations of said complaint.

2.

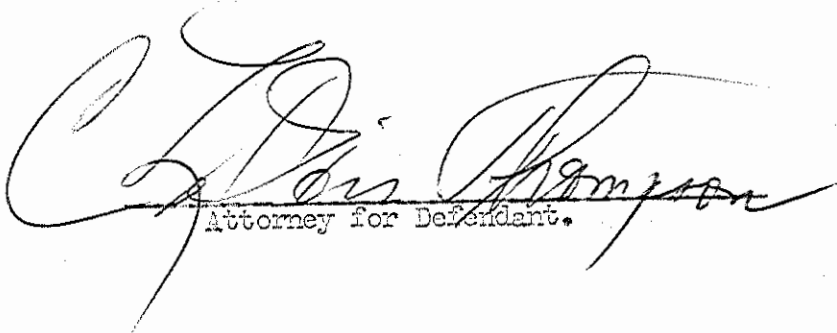
As to count two he denies the allegations of said complaint.

3.

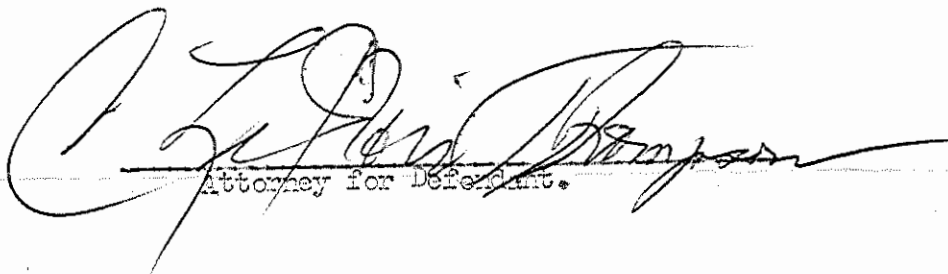
As to count three he denies the allegations of said complaint.

4.

As to count four he denies the allegations of said complaint.

  
Attorney for Defendant.

Defendant demands trial by jury.

  
Attorney for Defendant.

THE STATE OF ALABAMA §  
BALDWIN COUNTY §

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summons W. F. Godwin to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from the service hereof to the complaint of the Atmore Recap SHOP, Inc., a corporation, of the City of Atmore, Escambia County, Alabama.

Witness, this 24 day of April, 1957.

Archie L. Duck  
CLERK.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE, THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

C O M P L A I N T

THE ATMORE RECAP SHOP INC.,  
A CORPORATION.

PLAINTIFF.

VS.

W. F. GODWIN,

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

LAW SIDE.  
NUMBER: \_\_\_\_\_.

Count One.

The Plaintiff claims of the Defendant the sum of Seven Hundred and Eighty Eight and 95/100 (\$788.95) Dollars due by the Defendant to the Plaintiff on open account on to-wit; the 10th day of November, 1956 which said sum together with the interest thereon is due and unpaid.

Count Two.

The Plaintiff claims of the Defendant the sum of Seven Hundred and Eighty Eight and 95/100 (\$788.95) Dollars for goods, wares and merchandise sold by the Plaintiff to the Defendant on to-wit; From November 14, 1955 to and including November 10th, 1956 which said sum of money together with the interest thereon is due and unpaid.

Count Three.

The Plaintiff claims of the Defendant the sum of Seven Hundred and Eighty Eight and 95/100 (\$788.95) Dollars for money received by the defendant to the use of the plaintiff, which sums of money with the interest thereon, is still unpaid.

COUNT Four.

The Plaintiff claims of the Defendant the sum of Seven Hundred and Eighty Eight and 95/100 (\$788.95) Dollars due on account stated between the Plaintiff and the Defendant on the 10th day of November, 1956.

Which said sums of money, with interest thereon, are now due.

HORNE & WEBB

BY:

*Horne & Webb*  
ATTORNEYS FOR PLAINTIFF.

The Plaintiff has attached to the original summons and complaint in this cause a verified, itemized statement of account and gives notice that the same will be used in evidence on the trial of this cause.

HORNE & WEBB

BY:

*Horne & Webb*  
ATTORNEYS FOR PLAINTIFF.

THE STATE OF ALABAMA

ESCAMBIA COUNTY.

Before me, Douglas S. Webb, a notary public in and for said County in said State personally appeared Lois S. Wiggins, who is known to me, and who, being by me first duly sworn doth depose and say as follows:

That she is the bookkeeper for the Atmore Re-cap Shop, a corporation of the City of Atmore, Escambia County, Alabama, and as such she is well acquainted with their books of accounts; that the attached statement of the account of the debtor, W. F. Godwin, doing business as the Bay Minette Recap Shop is a true and correct itemized statement of the account of the said W. F. Godwin, doing business as the Bay Minette Recap Shop with the Atmore Recap Shop, a corporation, and that after all due credits are given there is now due to the said Atmore Recap Shop, a corporation, by the said W. F. Godwin, doing business as the Bay Minette Recap Shop the sum of SEVEN HUNDRED EIGHTY EIGHT AND 95/100 (\$788.95) DOLLARS, together with interest from the 1st day of February, 1957.

Lois S. Wiggins

Sworn to and subscribed before me this 17th day of April, 1957.

Douglas S. Webb

NOTARY PUBLIC

Notary Public, State of Alabama at Large  
My commission expires Oct. 19, 1959.  
Bonded by Employers Liability Assurance Corporation

Law Offices of  
Horne & Webb  
Attorneys at Law  
Atmore, Ala.

FRANK G. HORNE  
DOUGLAS S. WEBB

3219  
April 23, 1957.

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

Dear Mrs Duck:

Enclosed is a complaint we wish filed in the Circuit Court  
of your county for the Atmore Recap Shop, a corporation against  
W. F. Godwin.

With kindest personal regards I remain;

Very truly yours,

HORNE & WEBB

BY:



DOUGLAS S. WEBB

DSW/am.