

WILCO EQUIPMENT DISTRIBUTORS, INC..0

Plaintiff,0

VS.0

AYRES LITTLE, d/b/a LITTLE MOTOR  
COMPANY,0

Defendant.0

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 3373

Comes now, AYRES LITTLE, the defendant in the above styled cause and for answer to the complaint heretofore filed in said cause, and to each and every count thereof, separately and severally, sets down and assigns the following separate and several pleas:

1.

That the allegations of the complaint are untrue.

2.

That he has paid the debt or demand for the recovery of which this suit was brought, before this action was commenced.

3.

WHICH is the basis of plaintiff's suit

That the note/was given as security for the payment for certain goods and chattels which were sent by the plaintiff to the defendant on consignment for resale to the public; that the salesman, representing the plaintiff, who sold and delivered said goods and chattels to the defendant, acting within the line and scope of his authority as an agent, servant or employee of the said plaintiff, agreed with the defendant that the defendant should pay only for such of said goods and chattels as he actually sold, and that the plaintiff would take back such of the merchandise as was not sold, and would credit defendant with the value of such merchandise as it took back; and that he is and always has been ready and willing to return said goods and chattels to the plaintiff, and offered to do so before this action was commenced.

J. Blair A. Marshall, Jr.  
ATTORNEY FOR DEFENDANT.

Defendant respectfully requests that this cause be tried by a jury.

J. Blair A. Marshall, Jr.  
ATTORNEY FOR DEFENDANT.

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ayres Little, d/b/a/ Little Motor Company, 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 Ayres Little, d/b/a Little Motor Company, Defendant by Wilco Equipment Distributors, Inc., Plaintiff.

WITNESS my hand this 29 day of Oct, 1957.

Alice F. Duke  
Clerk

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WILCO EQUIPMENT DISTRIBUTORS, INC.

PLAINTIFF

VS

AYRES LITTLE,  
d/b/a LITTLE MOTOR COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. \_\_\_\_\_

1.

Plaintiff claims of the Defendant Three Hundred Ten (\$310.00) Dollars due by promissory note made by him on June 18, 1956 and payable on August 10, 1956 with interest thereon.

Plaintiff further claims of the Defendant a reasonable attorney fee as provided in the said promissory waive note.

Thompson & White

Mary Thompson White

William Grayson  
William Grayson  
Attorneys for Plaintiff