

SUMMONS

3377

THE STATE OF ALABAMA,)

BALDWIN COUNTY .)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon EUGENE A. KOEHLE, individually and doing business as KOEHLE MOTOR CO., INC., 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 EUGENE A. KOEHLE, individually, and doing business as KOEHLE MOTOR CO., INC. by COOPER TIRE & RUBBER COMPANY, a corporation.

Witness my hand this the 31 day of October, 1957.

Archie F. Duck
Clerk

COMPLAINT

COOPER TIRE & RUBBER
COMPANY, a Corporation,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

EUGENE A. KOEHLE, Individually
and doing business as KOEHLE
MOTOR CO., INC.,

AT LAW

DEFENDANT

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND NINE HUNDRED FORTY & 34/100 DOLLARS (\$1,940.34), due from him by account on, to wit: the 10th day of March, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE THOUSAND NINE HUNDRED FORTY & 34/100 DOLLARS (\$1,940.34), due from him on account stated between the plaintiff and the defendant on, to wit: the 10th day of March, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE THOUSAND NINE HUNDRED FORTY & 34/100 DOLLARS (\$1,940.34), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 10th day of March, 1956, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 28th day of August, 1957.

Willie C. Smith
Attorney for Plaintiff

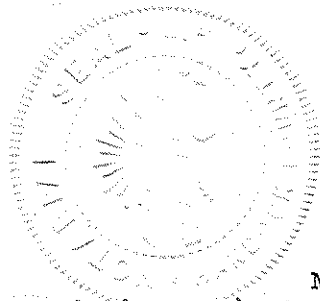
AFFIDAVIT OF ACCOUNT

STATE OF OHIO }
 } SS
COUNTY OF HANCOCK }

~~XXXXXX~~ B. E. Esterly being duly sworn, upon his oath says
that he is Ass't. Treasurer of Cooper Tire & Rubber Company,
a corporation incorporated by and under the laws of the State of
Delaware Findlay in the County of
Hancock and carrying on business at
Hancock State of Ohio and that he is duly authorized to make this
proof of debt. Further that the said Company firm is the sole, legal and
bona fide owner and holder of the certain account for goods, wares and
merchandise sold and delivered as per copy attached and marked "EXHIBIT A",
the said account is now wholly due and payable and that same is a full,
true and correct amount, and is a valid and lawful account against
Koehle Motor Company of Foley, Alabama
and that no payments have been made thereon except as appears, and
that there are no set-offs or counter claims against the same to the
knowledge of this affiant; that there is justly due the said claimant
upon the said account the sum of \$1,940.34 DOLLARS
with interest from the 10th day of March A.D. 1956
for which said claimant holds no security whatever.

B. E. Esterly
.....
~~XXXXXX~~ B. E. Esterly

SWORN TO by the said ~~XXXXXX~~ B. E. Esterly
before me, and subscribed in my presence,
this 28th day of August A.D. 1957



JANET EASTERLY, Notary Public
Hancock County, Ohio
My Commission Expires Jan. 31, 1959

Janet Easterly
.....
Notary Public

My commission expires

NAME

K. H. L. M. CO. ANY

DATE

4/12/55

ADDRESS

P. O. BOX, AIA.

DATE

DUTRO.

P. R. RUBEN

MOBILE BIA.

DATE	CODE	INV. NO.	CHARGES	CREDITS	DATE	BALANCE	REMARKS
BALANCE FORWARDED							
102%	TA 3,	2,401	204.64				
10'55	NT	2,401	29.96		APR 15'55	234.60 •	
102%	TA 3,	2,561	988.15				
10'55	NT	2,561	74.17		APR 18'55	1,296.92 •	
102%		3,130	182.76				
10'55	NT	3,130	9.92		APR 20'55	1,489.60 •	
162%	TA 3,	4,135	111.79				
16'55	NT 3,	4,135	8.82		APR 26'55	1,610.21 •	
102%		461	108.32				
10'55	NT	461	5.56		MAY 3'55	1,724.09 •	
102%		996	193.93				
10'55	NT	996	14.41		MAY 9'55	1,932.43 •	
10'55	NT	2,833	2.00		MAY 18'55	1,934.43 •	
102%		3,990	11.11		MAY 25'55	2,007.54 •	
10'55	NT	3,990	11.11		MAY 31'55	2,007.54 •	
10'55	NT	4,749	24.76		JUN 7'55	2,452.43 •	
102%		2,229	39.76				
10'55	NT	2,229	3.63		JUN 13'55	2,452.43 •	
102%		5,052	34.79				
10'55	NT	5,052	2.90		JUN 25'55	2,490.12 •	
P 28'55	25,			2,087.79	SEP 28'55	402.33 •	2,4
T 5'55	25,			402.33	OCT 5'55	.00 •	4
P 20'55	20,		2,087.79		OCT 31'55	2,087.79 •	
N 10'562%		4,136	26.20				2,0
N 10'56NT		4,136	1.76		DEC 23'55	2,115.75 •	
B 10'562%		4,484	206.78				2,1
B 10'56NT		4,484	14.46		DEC 28'55	2,336.99 •	
B 10'562%		1,467	284.48				2,3
B 10'56NT		1,467	19.34		JAN 16'56	2,640.81 •	
AN 13'56	25,			27.96	JAN 13'56	2,612.85 •	2,6
AR 10'56NT		655	24.47		FEB 6'56	2,637.32 •	2,6
B 15'56	26,			525.00	FEB 15'56	2,112.26 •	2,6
R 30'56	25,			100.00	APR 30'56	2,537.32 •	2,6
UN 22'56	25,			100.00	JUN 22'56	2,437.32 •	2,5
CT 10NT		6,083	12.38		AUG 31'56	2,449.70 •	
OV 6'56	25			189.00	NOV 6'56	2,260.70 •	
V 20'56	25			208.00	NOV 20'56	2,052.70 •	
B 4'57NT	30,	26		12.36	FEB 4'57	2,040.34 •	2,0
JUL 16'57	25,			100.00	JUL 16'57	1,940.34 •	2,0
Total 2527.32							
Lakeview							
2576							

1-12 NO. OF PAYMENTS
 13 NT REC OF INV
 14 NT CHECK REC'D
 15 C.O.D.
 16 S.O.B.L.
 17 ADVERTISING
 18 CHG BACK T.A.
 19 PROTEST FEES

20 CHECK N.S.F.
 21 CHG BACK DISCOUNT
 22 PAY CREDIT BALANCE
 23 PAY C/M
 24 MISC. DEBITS
 25 CHECK
 26 CHECK DISCOUNT
 27 ADJUSTMENT

28 EXC TAX
 29 P/R DED.
 30 RETURNED
 31 TRANSFER
 32 DSC. AT BANK
 33 WITHHOLDING TAX
 34 CANCEL
 35 EXPORT

PAY TO THE
ORDER OF

The Cooper Corporation
Two Thousand Eighty Seven and 79/100 - DOLLARS
Fire Acct
Farmers & Merchants Bank

61-292

Foley, Ala.

FOLEY, ALA.

Sept 20 1955

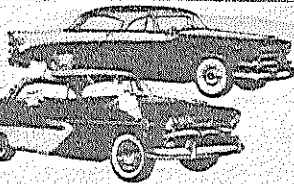
No. *124*

2087.79

DOLLARS

Eugene Koehle

THE BANK OF FRIENDLY SERVICE



KOEHLER MOTOR COMPANY, INC.
DODGE, PLYMOUTH & SALES AND SERVICE
WHEEL ALIGNING - WRECKER SERVICE

61-506

No. 3195

FOLEY, ALA. *Feb. 10* 1956

PAY TO THE
ORDER OF

The Cooper Corp
Five Hundred Fifteen and 23/100 - DOLLARS
FOR Feb acct 525.06 - Disc 9.83

\$515.

DOLLARS

KOEHLER MOTOR CO., INC.

STATE BANK OF ELBERTA
ELBERTA, ALABAMA

Eugene Koehle

Received 18 day of Nov 1957
and on 18 day of Nov 1957
reserved a copy of S/C
on Eugene A. Koehle

By service on _____

TAYLOR WILKINS, Sheriff
By Childers
Foley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Childers
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

COOPER TIRE & RUBBER COMPANY,
A CORPORATION,

PLAINTIFF

VS:

and EUGENE A. KOEHLE, ~~DOING BUS-~~
~~INESS AS~~ KOEHLE MOTOR CO., INC.,
and

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 31 1957

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA