

LOCKWOOD GRADERS OF ALABAMA, INC., I
An Alabama Corporation, I

Plaintiff, I

-VS- I

THEO STYRON, I

Defendant. I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

3494

C O M P L A I N T

The Plaintiff claims of the Defendant the sum of TWO THOUSAND THREE HUNDRED AND SIX DOLLARS AND NINETY-THREE CENTS (\$2,306.93) due by promissory note, originally in the sum of FOUR THOUSAND SIX HUNDRED AND NINETY-SIX DOLLARS AND SIXTY-NINE CENTS (\$4,696.69), made by the Defendant on, to-wit, the second day of January, 1955, and payable ONE THOUSAND DOLLARS (\$1,000.00) on the first day of December, 1955; TWO THOUSAND DOLLARS (\$2,000.00) on the first day of May, 1956; and ONE THOUSAND SIX HUNDRED AND NINETY-SIX DOLLARS AND SIXTY-NINE CENTS (\$1,696.69) on the first day of December, 1956; with interest thereon from the twelfth day of December, 1956 at the rate of eight per cent (8%) per annum until paid, and in said note, and as part of the consideration thereof, the Defendant agreed in case said note was placed in the hands of an attorney for collection, to pay a reasonable per cent additional fee for the collection of the same and the Plaintiff hereby claims the further sum of THREE HUNDRED AND FIFTY DOLLARS (\$350.00) as such attorney's fee.



E. G. RICKABY,
Attorney for the Plaintiff.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 Theo Styron

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

Theo Styron

, Defendant.

by Lockwood Graders of Alabama, Inc., An Alabama Corporation,

, Plaintiff.

Witness my hand this 2 day of April 1958

Executed
April 16, 1958

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Alice J. Duck, Clerk

LOCKWOOD GRADERS OF ALABAMA,
INC., an Alabama, Corporation

PLAINTIFF

VS:

THEO STYRON,

DEFENDANT


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - NO. 3494

ANSWER

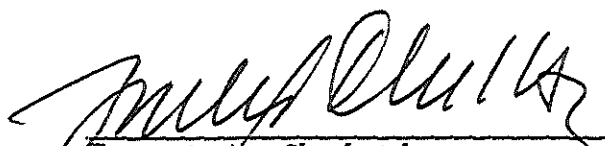
Comes the defendant and for answer to the complaint denies that
he is indebted to the plaintiff.



Forest A. Christian,
Attorney for Defendant

The defendant demands trial
by jury.

Filed
April 21, 1958



Forest A. Christian,
Attorney for Defendant

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

September 8, 1958

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

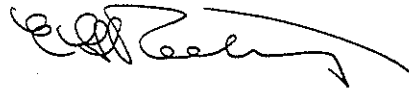
Dear Mrs. Duck:

3494
Inre: Lockwood Graders
Vs : Alakota Acres
Our File: 3807

Please mark this case "dismissed at the request of the Plaintiff, without prejudice" and in figuring up the cost please do not over-look the commissioners fee on that deposition that is filed in the cause.

Please mail me a ~~copy~~ bill and I will send it on to Plaintiff.

Yours very truly,



EGR/sl

cc: Mr. Andrew Parkansky

LOCKWOOD GRADERS OF
ALABAMA, INC.,
An Alabama Corporation,

Plaintiff

-VS-

THEO STYRON

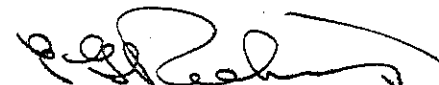
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NOTICE OF TAKING TESTIMONY

TO: MR. THEO STYRON, DEFENDANT AND TO FORREST CHRISTIAN, ESQUIRE,
HIS ATTORNEY.


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2
7
Please take notice that the Plaintiff, LOCKWOOD GRADERS
OF ALABAMA, INC., herein will take, in the above entitled action
to be used as evidence for the Plaintiff under Section 474 (4)
(C) (4), depositions of CHARLES H. WAITE, E. A. BARCELL, and
ANDREW K. PARKANSKY, witnesses, who reside over one hundred miles
from the place of trial of this cause, before a Notary Public in
and for SCOTTS BLUFF, COUNTY, NEBRASKA, who is not of counsel nor
attorney of any of the parties to, nor a relative nor employee of
such counsel, or attorney, nor interested in this case on the 8th
of August, 1958, at 3:00 o'clock, P. M. of that day, in the office
of JAMES W. PONDER, JR., Courier Building, Gering Nebraska, at
which time and place you are hereby notified to appear and take
such part in such examination as you may be advised, and shall be
fit and proper.


Attorney for the Plaintiff

I hereby certify that I have this day mailed a copy
of the above notice to FORREST CHRISTIAN, ESQUIRE, attorney for
the Defendat, THEO STYRON.

14 July 1958

Sent by certified Mail
Certificate # 482832.


Attorney for the Plaintiff.

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

March 31, 1958

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

Dear Mrs. Duck:

Inre: Lockwood Graders of Ala, Inc.
Vs: Theo Styron
Our File: 3807

With this we are handing you Summons and Complaint
in the case of Lockwood Graders of Alabama, Inc. vs.
Theo Styron, together with a deposit for costs in
the sum of \$20.00, along with letter to the sheriff.

Please process and oblige.

Yours very truly,



EGR/ts

cc: Mr. A. K. Parkansky, Corp. Counsel
Lockwood Grader Corporation

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA
February 21, 1959

Mrs. Alice Duck
Circuit Court
Bay Minette, Ala.

Inre: Lockwood Graders
vs: Alakota Acres
#3807

Dear Mrs. Duck:

I thought I wrote you to dismiss this case at the last time at court, if I didn't please consider this letter as authority to do so, and if possible keep it off the printed docket.

Yours very truly,



EGR/eb

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

December 5, 1958

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

Dear Mrs. Duck:

Inre: Lockwood Graders of Alabama,
Inc.
Vs: Theo Styron
Case No. 34921
Our File: 3807

Request you please send me the cost bill in the
above mentioned case as I have to forward it to
my client.

I believe you will find the above style correct,
although it may read, "Lockwood Graders of Alabama,
Inc. vs. Theo Styron, individually and doing business
as Alakota Acres".

Thanks.

Yours very truly,



ts
1-1-59