

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN PULLIAM,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

NO. 3940

PLEAS

Comes now the Defendant in the above styled cause and further amends
his answers to the Bill of Complaint in Each count separately and severally
by adding the following plea:

4.

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

WILTERS & BRANTLEY

BY *Henry Wilters, Jr.*
Attorney for the Defendant

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN FULLIAM,

DEFENDANT

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA,

) AT LAW

) NO. 3940

PLEAS

Comes now the Defendant in the above styled cause and further amends his answers to the Bill of Complaint in Each count separately and severally by adding the following plea:

4.

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

WILTERS & BRANTLEY

Filed
9-12-60

BY

Walter J. Witters Jr.
Attorney for the Defendant

3940

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN PULLIAM,

DEFENDANT

PLEAS

Filed
9-12-60
A. J. French
clerk

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN PULLIAM,

DEFENDANT

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)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 3940

Comes now the Defendant in the above styled cause and amends
his answer to the Complainant's Complaint on each count thereof separ-
ately and severally by adding the following pleas:

2.

That the debts sued on are barred by the Statute of Limita-
tions for three years.

3.

That the debts sued on are barred by the Statute of Limita-
tions for six years.

FILED

SEP 8 1960

ALICE J. DUCK, CLERK
REGISTER

WILTERS & BRANTLEY

BY

Walter J. Wilters
Attorneys for the Defendant

3940

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN PULLIAM,

DEFENDANT

ANSWER

FILED

SEP 8 1960

ALICE L. DUCK, CLERK
REGISTER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 3940

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's Complaint and each and every count separately and severally says:

i.

The facts alleged therein are untrue.

Wilters & Brantley

BY: Greg Wilkins
Attorney for the Defendant

The Defendant demands a trial by jury.

FILED

SEP 14 1959

ALICE L. BUCK, CLERK
REGISTRAR

Wilters & Brantley

BY: Henry J. Wilkes, Jr.
Attorney for the Defendant

2940

MOBILE POWER BRAKE &
EQUIPMENT CO., INC., AN
ALABAMA CORPORATION,

PLAINTIFF

VS

NATHAN PULLIAM

DEFENDANT

ANSWER

FILED

SEP 14 1959

ALICE J. DUCK, CLERK
REGISTER

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon NATHAN PULLIAM, 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 the place of holding same by MOBILE POWER BRAKE & EQUIPMENT CO., INC., an Alabama Corporation.

Witness my hand this the 17 day of August, 1959.

Alice J. Duck
Clerk

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COMPLAINT

MOBILE POWER BRAKE &  
EQUIPMENT CO., INC., an  
Alabama Corporation,  
PLAINTIFF

VS:

NATHAN PULLIAM,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY-TWO & 23/100 DOLLARS (\$272.23), due from him by account on, to wit: the 6th of September, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY-TWO & 23/100 DOLLARS (\$272.23), due from him on account stated between the plaintiff and the defendant on, to wit: the 6th day of September, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED SEVENTY-TWO & 23/100 DOLLARS (\$272.23), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 6th day of September, 1954, 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 27th day of July, 1959.

The defendant's address is:

Robertsdale, Alabama

James C. Smith  
Attorney for Plaintiff

FILED

8-17-59

CLERK  
REGISTER  
ALICE J. DUCK



COUNTY OF Mobile

8G-188 (12743)

STATE OF Alabama

Be it remembered, that on this 27th day of July  
A. D., 1959, personally appeared before me, the undersigned authority,  
Franklin P. McDonald known to me  
who being duly sworn, upon his oath stated that he is President  
of Mobile Power Brake & Equipment Co., Inc.  
{ a corporation organized and doing business under the laws of the State of Alabama  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of \_\_\_\_\_  
\_\_\_\_\_ a sole trader doing business as Mobile Power Brake & Equipment Co., Inc.  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Mobile Power Brake & Equipment Co., Inc.; that the attached account against  
Nathan Pulliam of Robertsdale, 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 Nathan Pulliam  
at { its  
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 Seventy-two and 23/100 - - Dollars  
(\$ 272.23 ) with interest from September 1954 is justly due and  
remains unpaid.

Franklin P. McDonald

X

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 Alabama  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Clayton K. Kudo  
Notary Public

County of Mobile State of Alabama  
My commission expires 10-17 A. D. 1960

INVOICE  
**MOBILE POWER BRAKE & EQUIPMENT**  
TRUCK EQUIPMENT SPECIALIST



HE 2-2743

156 BEAUREGARD & ST. JOSEPH  
MOBILE, ALABAMA

Date 7-16-54

**SOLD  
TO**

Nathan Pulliam  
Robertsdale, Alabama

INV. NO. 616

CUSTOMER'S P. O. NO.

CUSTOMER'S REQ. NO.

| QUANTITY | CATALOG NO. | DESCRIPTION        | PRICE            | AMOUNT   |
|----------|-------------|--------------------|------------------|----------|
| 2        | 20"         | Rims<br>Extra Wide | \$32.50 \$ 65.00 | \$ 48.75 |
|          |             | Fed Tax            |                  | 3.90     |
|          |             |                    |                  | \$ 52.65 |
|          |             | Ala. Tax           |                  | 1.59     |
|          |             |                    |                  | \$ 54.24 |

*McNeel*

TRUCK EQUIPMENT AND ACCESSORIES • SALES AND SERVICE

Brake Lining

5th Wheels

Rims and Parts

Brake Drums

Landing Gears

Wheels and Parts

Brake Parts

Gas Tanks

Trailer Axles

INVOICE

# MOBILE POWER BRAKE & EQUIPMENT

TRUCK EQUIPMENT SPECIALIST



156 BEAUREGARD & ST. JOSEPH  
MOBILE, ALABAMA

HE 2-2743

SOLD  
TO

Date 8-3-54

Nathan Pulliam  
Robertsdale, Alabama

INV. NO. 643

CUSTOMER'S P. O. NO.

CUSTOMER'S REQ. NO.

| QUANTITY | CATALOG NO. | DESCRIPTION              | PRICE    | AMOUNT   |
|----------|-------------|--------------------------|----------|----------|
| 1        | 1106 R      | 1 qt. Fire Extinguisheer | \$ 19.02 | \$ 12.68 |
| 1        | Bracket     | Bracket                  | Fed. Tax | 1.01     |
| 3        | Flares      | Flares                   | Net      | 1.50     |
|          |             |                          |          | <hr/>    |
|          |             |                          |          | \$ 15.19 |
|          |             |                          |          | <hr/>    |
|          |             |                          |          | Tax .46  |
|          |             |                          |          | <hr/>    |
|          |             |                          |          | \$ 15.65 |

*[Handwritten Signature]*

TRUCK EQUIPMENT AND ACCESSORIES • SALES AND SERVICE

Brake Lining      5th Wheels      Rims and Parts

Brake Drums      Landing Gears      Wheels and Parts

Brake Parts      Gas Tanks

INVOICE

# MOBILE POWER BRAKE & EQUIPMENT

TRUCK EQUIPMENT SPECIALIST



HE 2-2743

156 BEAUREGARD & ST. JOSEPH  
MOBILE, ALABAMA

Date 8-3-58

SOLD  
TO

Nathan Pulliam  
Robertsdale, Alabama

INV. NO. 646

CUSTOMER'S P. O. NO.

CUSTOMER'S REQ. NO.

| QUANTITY | CATALOG NO. | DESCRIPTION          | PRICE | AMOUNT      |
|----------|-------------|----------------------|-------|-------------|
| 1        | 1111X       | Oil Flares<br>in box |       | \$ 14.00    |
| 3        |             | Flags & Staff        | .60   | 1.80        |
|          |             |                      |       | 15.80       |
|          |             |                      |       | 11.85       |
|          |             |                      |       | Fed Tax .95 |
|          |             |                      |       | Ala Tax .39 |
|          |             |                      |       | \$ 13.19    |

TRUCK EQUIPMENT AND ACCESSORIES • SALES AND SERVICE

Brake Lining

5th Wheels

Rims and Parts

Brake Drums

Landing Gears

Wheels and Parts

Brake Parts

Gas Tanks

Trailer Axles

INVOICE  
**MOBILE POWER BRAKE & EQUIPMENT**  
TRUCK EQUIPMENT SPECIALIST



HE 2-2743

156 BEAUREGARD & ST. JOSEPH  
MOBILE, ALABAMA

Date 8-3-54

SOLD  
TO

Nathan Pulliam  
Robertsdale, Alabama

INV. NO. 647

CUSTOMER'S P. O. NO.

CUSTOMER'S REQ. NO.

| QUANTITY | CATALOG NO. | DESCRIPTION                                               | PRICE | AMOUNT    |
|----------|-------------|-----------------------------------------------------------|-------|-----------|
| 1        |             | Trailmobile Bus Flap                                      | 11.00 | \$ 9.35   |
| 1        | 36"         | ASF Fifth Wheel with Mounting Plate<br>Installed on Chev. |       | \$ 160.00 |
|          |             | Fed Tax                                                   |       | 12.80     |
|          |             | Freight                                                   |       | \$ 172.80 |
|          |             | Ala Tax                                                   |       | \$ 115.19 |
|          |             |                                                           |       | \$ 177.99 |

*[Handwritten Signature]*

TRUCK EQUIPMENT AND ACCESSORIES • SALES AND SERVICE

Brake Lining

5th Wheels

Rims and Parts

Brake Drums

Landing Gears

Wheels and Parts

Brake Parts

Gas Tanks

Trailers

STATEMENT

# MOBILE POWER BRAKE & EQUIPMENT

MOBILE, ALA.

156 BEAUREGARD STREET. PHONE HE 2-2743

TRUCK EQUIPMENT DISTRIBUTORS - POWER BRAKE SPECIALISTS

SALES & SERVICE

Nathan Pulliam

Robertsdale, Alabama

| DATE    | REFERENCE | CHARGES | CREDITS         | BALANCE |
|---------|-----------|---------|-----------------|---------|
|         |           |         | BALANCE FORWARD | .00     |
| 1954    |           |         |                 | 54.24   |
| Jul. 16 | 616       | 54.24   |                 | 69.89   |
| Aug. 3  | 643       | 15.65   |                 | 83.08   |
| Aug. 3  | 646       | 13.19   |                 | 261.07  |
| Aug. 3  | 647       | 177.99  |                 | 272.23  |
| Sep. 6  | 893       | 11.16   |                 |         |

*J. P. Kipwood*

3940

ived 17 day of Aug 1959  
on 2 day of Sept 1959  
ved a copy of the within D.C.  
Nathan Pulliam

service or  
TAYLOR WILKINS, Sheriff  
By Edleigh Steadman, S.

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY Edleigh Steadman  
DEPUTY SHERIFF

Robertdale, Ala

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

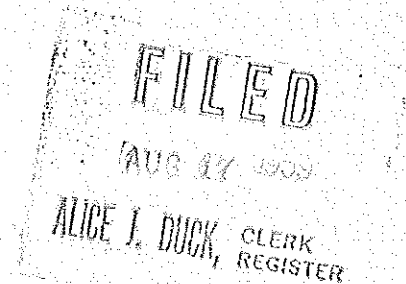
MOBILE POWER BRAKE &  
EQUIPMENT CO., INC., an Alabama  
Corporation,

PLAINTIFF

VS:

NATHAN PULLIAM,

DEFENDANT



LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA