

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon DAVID JAYE, doing business as Rock Hill Service Center, 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 ALABAMA AUTO PARTS COMPANY, an Alabama Corporation.

Witness my hand this the 4 day of November, 1959.

David L. Duck
Clerk

COMPLAINT

4036

ALABAMA AUTO PARTS COMPANY,)
an Alabama Corporation,)
PLAINTIFF)
VS:)
DAVID JAYE, d/b/a ROCK HILL)
SERVICE CENTER,)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I:

The plaintiff claims of the defendant FIVE HUNDRED THIRTY-EIGHT & 19/100 DOLLARS (\$538.19), due from him by account on, to wit: the 24th day of November, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant FIVE HUNDRED THIRTY-EIGHT & 19/100 DOLLARS (\$538.19), due from him on account stated between the plaintiff and the defendant on, to wit: the 24th day of November, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant FIVE HUNDRED THIRTY EIGHT & 19/100 DOLLARS (\$538.19), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 24th day of November, 1958, 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 13th day of October, 1959.

The defendant's address is:
Bay Minette, Alabama

W. L. Allen
Attorney for Plaintiff

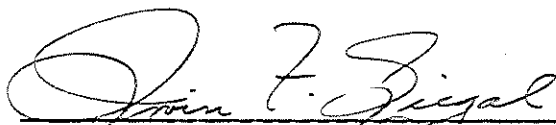
AFFIDAVIT

THE STATE OF ALABAMA,)

JEFFERSON COUNTY,)

Irvin F. Siegal, first being duly sworn, deposes and says as follows:

I, IRVIN F. SIEGAL, being Vice President and in charge of the accounts of Alabama Auto Parts Company, which is an Alabama corporation, do hereby certify that the attached ledger showing itemized charges and credits and a balance of FIVE HUNDRED THIRTY-EIGHT & 19/100 DOLLARS (\$538.19) is a true and correct statement of the account owed by Rock Hill Service Center, Bay Minette, Alabama, on the 13th day of October, 1959.



Irvin F. Siegal, Vice President
Alabama Auto Parts Company

Sworn to and subscribed to before me this the 13th day of October, 1959, by Irvin F. Siegal, known to me to be Vice President of Alabama Auto Parts Company.

Affix Seal:

My Commission Expires:

5/19/61



Notary Public, Jefferson
County, Alabama



SALESMAN

LEDGER

NAME Rock Hill Service Center
Bay Minnôte, Alabama

ADDRESS

CREDIT LIMIT

DATE	REFERENCE	CHARGES	✓	CREDITS	✓	BALANCE
BALANCE FORWARDED						
7-10-58	C 82685	250.00				
7-14-58	CM 31045			55.00		
7-15-58	C 82700	15.12				
7-16-58	E 21275	250.00				
8-12-58	CM 30435			44.75		
9-3-58	CL 7617	255.82		33.00		
9-3-58	CM 30432			100.00		
11-24-58	Cash Paymt.					538.19

4036

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Received 4 day of Nov 1959
and on 5 day of Nov 1959
served a copy of the within 39C
on David Jaye
by service

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.
Sm

ALABAMA AUTO PARTS COMPANY, an
Alabama Corporation,
PLAINTIFF

VS:

DAVID JAYE, d/b/a ROCK HILL
SERVICE CENTER,
DEFENDANT

FILED

NOV 11 1959

CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA