

4209

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon HOUSTON H. ROBERTSON 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 BETBEZE MANUFACTURERS-DISTRIBUTORS, an Alabama Corporation.

Witness my hand this the 14 day of March, 1960.

Ex 3-14-60
Allice L. Duck
Clerk
* * * * *

COMPLAINT

BETBEZE MANUFACTURERS-)	
DISTRIBUTORS, an Alabama)	
Corporation)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF)	BALDWIN COUNTY, ALABAMA
)	
VS:)	
)	AT LAW
)	
HOUSTON H. ROBERTSON,)	
DEFENDANT)	

COUNT I:

The plaintiff claims of the defendant ONE HUNDRED EIGHTY & 97/100 DOLLARS (\$180.97), due from him by account on, to wit: the 8th day of June, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE HUNDRED EIGHTY & 97/100 DOLLARS (\$180.97), due from him on account stated between the plaintiff and the defendant on, to wit: the 8th day of June, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE HUNDRED EIGHTY & 97/100 DOLLARS (\$180.97), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 8th day of June, 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 4th day of March, 1960.

The defendant's address is: *Mary Blair*
Bay Minette, Alabama Attorney for Plaintiff

FILED
MAR 14 1960
ALICE L. DUCK, CLERK
REGISTER

COUNTY OF MOBILE

8G-188 (15743)

STATE OF ALABAMA

Be it remembered, that on this 4th day of MARCH
A. D., 1960, personally appeared before me, the undersigned authority,
WILLIAM C. BETBEZE, SR. known to me

who being duly sworn, upon his oath stated that he is PRESIDENT
of BETBEZE MANUFACTURERS-DISTRIBUTORS

X { 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
and that as such he makes this affidavit; that he is familiar with the books and business of
said BETBEZE MANUFACTURERS-DISTRIBUTORS;

that the attached account against
HOUSTON H. ROBERTSON of BAY MINETTE, 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 HOUSTON H. ROBERTSON

at { its
{ their } special instance and request, that credit has been duly given for all payments and
{ his } his
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of ONE HUNDRED EIGHTY AND 97/100 Dollars
(\$180.97) with interest from June 8, 1958 is justly due and
remains unpaid.

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.

Mary B. Farnell

Notary Public

County of Mobile State of Alabama
My commission expires December 9, A. D. 1961



MANUFACTURERS ~~AND~~ DISTRIBUTORS

CUSTOM BUILT
STAKES, VANS
FURNITURE BODIES

3255 Moffat Road Dial GA 6-8641
P. O. Box "G", Crichton Station
MOBILE, ALABAMA

BRADEN WINCHES
HERCULES DUMPS
FABCO DUAL DRIVES

STATEMENT OF ACCOUNT

TO: HOUSTON H. ROBERTSON
BAY MINETTE, ALABAMA

Date	Folio	Charges	Due
May 8, 1958	A7321	180.97	180.97

ADDRESS ALL COMMUNICATIONS TO THE COMPANY

Betbeze

MANUFACTURERS ~~AND~~ DISTRIBUTORS

CUSTOM BUILT
STAKES. VANS
FURNITURE BODIES

3255 Moffat Road Garden 6-8641
P. O. Box "G", Crichton Station
MOBILE, ALABAMA

BRADEN WINCHES
HERCULES DUMPS
FABCO DUAL DRIVES

May 8, 1958

SOLD TO

Houston H. Robertson
Bay Minette, Alabama

TERMS—NET, NO DISCOUNT

INVOICE NO. A 7321

YOUR ORDER NO.

OUR ORDER NO.

SALESMAN

DEL. RECEIPT NO. B:10687, 10938

HOW SHIPPED Signed: J.T. Robertson

QUANTITY	ITEMS	PRICE	AMOUNT
1	SP 432 Spring Assembly	114.00	91.20
	Freight		5.70
	Fed. Tax		5.47
			<u>102.37</u>
	Ala. Sales Tax		<u>3.07</u>
	Delivery Receipt B 10687 - - - - -		\$105.44
1	1/2X6 Center Bolt	.80	.60
1	5X3/4X#3 Leaf	32.00	25.60
1	5X3/4X#1 Leaf	49.00	39.20
			<u>65.40</u>
	Freight		4.05
	Fed. Tax		<u>3.88</u>
			<u>73.33</u>
	Ala. Sales Tax		<u>2.20</u>
	Delivery Receipt B 10938 - - - -		<u>75.53</u>
			\$ 180.97
	TOTAL INVOICE		\$ 180.97

COPY

SUMMONS AND COMPLAINT

BETBEZE MANUFACTURERS-DISTRIBU-
TORS, an Alabama Corporation
PLAINTIFF

VS:

HOUSTON H. ROBERTSON
DEFENDANT

Received 14 day of March 1960
and on 14 day of March 1960
I served a copy of the within S & C
on Houston Robertson
By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Zeltz D. S.

8 miles East of
B.M.

Sheriff claims 16 miles at

Ten Cents per mile Total \$ 1.60

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

FILED

MAR 14 1960

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA