

DOCKET NO. 174

NUMBER	TERM	YEAR
542	May	1961

Motive Parts Co

VERSUS

Milford Carson Coal Co

Motive Parts Co.

VERSUS

Wilford Carson
+ 1/2/3/4
Wilford Carson Coal Co. Inc.

To Wm. J. Hargrave

Prothonotary.

Sir: Enter Judgment ~~appearance~~ for against Wilford Carson - 1/2/3/4 Wilford Carson
Coal Company for court of
assurance field

in above case.

Attorney for

Plaintiff

Judgment \$3448 65
date from August 1-1960

Bill Substantially
settled in sum

No. 542 Term May 1961

Motion filed:

vs.

Wilfred Cannon

T/0/3/1

Wilfred Cannon

Local Corp

APPEARANCE

Principals

For

Wilfred Cannon

FILED

AUG 24 1961

WM. T. HAGERTY
PROTHONOTARY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.

MOTIVE PARTS CO. :
VS: : NO. 542 Term, 1961
MILFORD CARSON, t/d/b/a : IN ASSUMPSIT
MILFORD CARSON COAL CO. :
:

COMPLAINT

Now, comes the Plaintiff, Motive Parts Company, by its attorneys Bell, Silberblatt & Swoope, and files this complaint against the defendant.

1. The Plaintiff is Motive Parts Company, a corporation duly organized under the laws of the Commonwealth of Pennsylvania, with its principal place of business at 6389-99 Penn Avenue, Pittsburgh, Pennsylvania.
2. The Defendant is Milford Carson, t/d/b/a Milford Carson Coal Company, with its principal office and place of business at Osceola Mills, Clearfield County, Pennsylvania.
3. The Plaintiff Corporation at the special instance and request of the Defendant, sold and delivered to the Defendant, machinery, goods, wares, in the amounts of the kinds, and for the prices set forth in a true and correct copy of account taken from the Plaintiff's books of original entry, hereto attached and marked "Exhibit A".
4. That the goods and merchandise were the subject or contract between the plaintiff and the defendants.
5. That the prices charged for said goods, wares and merchandise are just and reasonable, and are the prices which the defendants promised to pay Plaintiff for the same.
6. The Plaintiff has demanded payment from the defendants of the amount due, but the defendants have refused and still refuse to pay the same, or any part thereof.

WHEREFORE, the Plaintiff demands judgment against the Defendant for Three Thousand Four Hundred Forty Eight Dollars and Sixty five cents (\$3,448.65), *with interest from August 1-1966*

BELL, SILBERBLATT & SWOOP

By- Walter M. Swoope
Attorneys for Plaintiff

STATE OF PENNSYLVANIA:

: SS:

COUNTY OF ALLEGHENY :

Personally appeared before me, a Notary Public, in
and for the above county and state. Charles S. Bygate
who being duly sworn according to law, deposes and says that he
is the President of the Motive Parts Company, the Plaintiff
herein, and that the facts set forth in the foregoing complaint are
true and correct to the best of his knowledge, information and belief.

Charles S. Bygate
Pres.

Sworn to and subscribed

before me this 14th day
of July, 1961.

Agnes M. Keelan

AGNES M. KEELAN, Notary Public
Pittsburgh, Allegheny Co., Pa.
My Commission Expires
Feb. 10, 1965

HILAND 1-1000

STATEMENT



6389-99 PENN AVENUE, EAST LIBERTY
PITTSBURGH 6, PA.

IN ACCOUNT WITH

Milford Carson Coal Co.

Esceola Mills, Pa.

DETACH AND RETURN THIS STUB WITH YOUR REMITTANCE

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
			BAL. FORWARDED	
5/16/60	CL 23826	364.27		
5/20/60	24133	2,384.38		
5/20/60	24142	185.36		
6/1/60	24142	185.36		
8/15/60	42652	180.80		
9/10/60	43142	145.64		
7/19/60	24867	<u>10.93</u>		
On Account		3,453.19 <u>4.54</u>		
		3,448.65		
<u>"EXHIBIT-A"</u>				

SETTLEMENTS REQUIRED ON OR BEFORE THE 10TH OF THE MONTH



 PAY LAST AMOUNT
IN THIS COLUMN

INVOICE



MOTIVE PARTS COMPANY OF PA.



6389-99 PENN AVENUE - PITTSBURGH 6, PA. - EAST LIBERTY
COMPLETE MACHINE SHOP - SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD
TO

Milford Carson Coal Co.

Osceola Mills, Pa.

THIS INVOICE NUMBER MUST ACCOMPANY
MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
			5/6/60	CL23826	
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
1		1500 DPW 2CA Fairbanks pump			260.51
1		120 Gal Pressure Tank			88.00
1		Fitting Kit & Control Valve			15.76
					364.27



PHONE
HILAND 1-1000

"We certify that these goods were produced in compliance with all applicable requirements of section 6, 7 and 12 of the Fair Labor Standards Act, as amended, and regulations and orders of the U. S. Department of Labor under section 14.

NO GOODS RETURNED AFTER 30 DAYS.
10% HANDLING CHARGE ON ALL NEW
PARTS RETURNED FOR CREDIT.

INVOICE

**MOTIVE PARTS COMPANY OF PA.**

6389-99 PENN AVENUE - PITTSBURGH 6, PA. - EAST LIBERTY
 COMPLETE MACHINE SHOP • SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD
 TO
 Milford Carson Coal Co.
 Oseola Mills, Pa.

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 MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
1		074481 Westrac roller			160.75
4		051919 " blocks		1.93	7.72
2		066692 " ends		5.85	11.70
4		3/4 x 4 $\frac{1}{2}$ SAE bolts		.41	1.64
					181.81



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**MOTIVE PARTS COMPANY OF PA.**

6389-99 PENN AVENUE - PITTSBURGH 6, PA. - EAST LIBERTY

COMPLETE MACHINE SHOP - SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD
TO

Milford Carson Coal Co.

Osceola Mills, Pa.

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YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
			5/26/60	CL24133	
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
1		Tap & Die set			150.00
2		264-014 R91 Westrac Track links		1117.19	<u>2,334.38</u>
					2,384.38

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COMPLETE MACHINE SHOP - SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD Milford Carson Coal Co.
TO
Osceola Mills, Pa.

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MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
1		1 x 7 USS bolt			4.31
1		" " nuts			.25
160'		1 ¹ / ₄ " IWRC cable			180.80
					185.36

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 COMPLETE MACHINE SHOP - SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD
TO

Milford Carson Coal Co.

Osceola Mills, Pa.

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 MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
			7/8/60	CL24867	
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
3		PR 1-1 Purolator		3.06	2.13
2		EP 78 "		4.13	2.27
					<u>4.54</u>
					10.93



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INVOICE

**MOTIVE PARTS COMPANY OF PA.**

6389-99 PENN AVENUE - PITTSBURGH 6, PA. - EAST LIBERTY
 COMPLETE MACHINE SHOP • SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

SOLD
TO

Milford Carson

Oscelo Mills, Pa.

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 MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.	REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.	
160'		1 $\frac{1}{4}$ 6 x 41 IWRC cable		8/5/60	CL42652
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
160'		1 $\frac{1}{4}$ 6 x 41 IWRC cable			180.80



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 COMPLETE MACHINE SHOP - SERVICE PARTS FOR ALL CARS, TRUCKS, TRACTORS, BUSES AND INDUSTRIAL EQUIPMENT

SHIPPED TO

 SOLD
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Milford Carson Coal Co.

Osceola Mills, Pa.

 THIS INVOICE NUMBER MUST ACCOMPANY
 MATERIAL RETURNED FOR CREDIT.

YOUR ORDER NO.		REQUISITION NO.	VIA	INVOICE DATE	INVOICE NO.
QUANTITY	BACKORDERED	ARTICLE	SHIPPED	PRICE	TOTAL
1		6012 GE hd. lamp		2.75	1.66
1		C12FL Signal Stat.		.60	.30
52		3/4" 6 x 25 R/S IWRC cable			25.01
4		5 x $\frac{1}{2}$ RIF Raybestos		24.35	38.96
58		rivets			.05
$\frac{1}{2}$ set		9119 Raybestos		53.08	21.24
35		rivets			.05
2		EP 78 Purolator		4.13	1.75
6		4 x $\frac{1}{2}$ RIF Raybestos		19.57	4.54
46		rivets			.05
					46.98
					2.30
					145.64


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 PARTS RETURNED FOR CREDIT.

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA.
No. 542 May Term, 1961.
In Asumpsit

MOTIVE PARTS CO.

VS:

MILFORD CARSON, t/d/b/a
MILFORD CARSON COAL CO.

COMPLAINT

To the within named Defendant:

You are hereby required to file an
Answer to the within Complaint In
Asumpsit within twenty (20) days
from date of the service hereof.

Bell, Silberblatt & Swoope

By Amie M. Swoope
Attorneys for Plaintiff

BELL, SILBERBLATT & SWOOPPE
ATTORNEYS AT LAW
101 Main Street
Pittsburgh
Clearfield, Pennsylvania
WM. J. MACARTHUR
NOTARY PUBLIC
W.M. J. MACARTHUR
NOTARY PUBLIC

4/50 by AM

In the Court of Common Pleas of Clearfield County, Pa.

Motive Parts Co.

No 542 May Term 1961

vs

Milford Carson t/d/b/a
Milford Carson Coal Co

Complaint In Assumpsit

Now, July 26, 1961 at 2:30 O'Clock P.M. served the within Complaint In Assumpsit on Milford Carson at place of residence R.D. Osceola Mills, Pa. by handing to Milford Carson personally a true and attested copy of the original Complaint In Assumpsit and made known to him the contents thereof.

Costs Sheriff Ammerman \$10.20
(Paid by Atty Swoope)

So Answers,

Charles G. Ammerman
Sheriff

Sworn to before me this 28th
day of July 1961 A.D.

Prothonotary.

