

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Edmund R. Cimino, individually and Edmund R. Cimino, d/b/a The Smart Shop, to appear and plead, answer or demur within thirty days from the service hereto to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, by Doris Dodson Garment Company, a Corporation.

Witness my hand this the 2 day of Aug, 1961.

Est - 8-4-61 Alice J. Duck  
Alice J. Duck, Clerk

DORIS DODSON GARMENT COMPANY,  
A Corporation

Plaintiff

VS

EDMUND R. CIMINO, Individually  
and EDMUND R. CIMINO d/b/a THE  
SMART SHOP

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4797

1.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED DOLLARS (\$300.00), due from him by account on, to-wit, April 7, 1961, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED DOLLARS (\$300.00), due from him on account stated between the Plaintiff and the Defendant on the 7th day of April, 1961, which sum of money with the interest thereon, is still unpaid.

3.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED DOLLARS (\$300.00), due from him by account on the 7th day of April, 1961, which sum of money with the interest thereon, is still unpaid.

FILED

AUG 10 1961

Alice J. Duck, CLERK REGISTER

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit  
Attorneys for the Plaintiff

STATE OF Missouri

~~COUNTY~~ OF St. Louis

Before me William L. Kelly, a Notary Public, in and for said County and State, personally appeared E. A. Donze, who being by me duly sworn, deposes and says, that he is Credit Manager for the firm of Doris Dodson Garment Company; that the annexed statement of the account of said firm against the Smart Shop of Bay Minette, in the State of Alabama, is just, true and correct; that there is now due on said account the sum of \$ 300.00, after deducting all credits, set-offs or counter-claims.

E. A. Donze  
Affiant

Sworn to and subscribed before me this 20 day of July, 1961.

My Commission Expires July 14, 1964

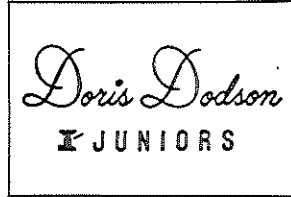
William L. Kelly  
Notary Public,

Notary for the City of St. Louis  
which adjoins the County of St. Louis

STATEMENT

DORIS DODSON GARMENT COMPANY

1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI



SMART SHOP  
BAY MINETTE  
ALABAMA

CODE NUMBER

We render statements on the 25th of each month, for all bills, DUE or NOT DUE, as per our ledger, and this is NOT A DEMAND FOR BILLS NOT DUE. Invoices dated 25th or after will appear on next month's statement.

7 19 61  
MO. DAY YEAR

INVOICE DATE		INVOICE NO.	DESCRIPTION	DEBIT		CREDIT		PAY LAST AMOUNT IN THIS COLUMN	
MO.	DAY								
<u>1960</u>									
8	25	274096	EOM	19	88				
8	25	274383	EOM	181	31				
8	26	274752	EOM	76	56				
8	30	275655	EOM	38	26				
9	07	276777	EOM	22	44				
				338	45			338	45
<u>1961</u>									
4	07	Cash paid	on account			38	45		
				338	45	38	45	300	00

PLEASE RETURN COPY WITH YOUR REMITTANCE

STATEMENT

DORIS DODSON GARMENT COMPANY

1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI

*Doris Dodson*  
JUNIORS

We render statements on the 25th of each month, for all bills, DUE or NOT DUE, as per our ledger, and this is NOT A DEMAND FOR BILLS NOT DUE. Invoices dated 25th or after will appear on next month's statement.

7 19 61  
MO. DAY YEAR

CODE NUMBER

SMART SHOP  
BAY MINETTE  
ALABAMA

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MO.	DAY								
<u>1960</u>									
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8	25	274383	EOM	18	31				
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DORIS DODSON GARMENT COMPANY

1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI

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SMART SHOP  
 BAY MINETTE  
 ALABAMA

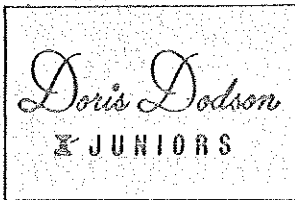
CODE NUMBER

7 | 19 | 61  
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				338	45			338	45
<u>1961</u>									
4	07	Cash paid	on account			38	45		
				338	45	38	45	300	00

PLEASE RETURN COPY WITH YOUR REMITTANCE

DORIS DODSON GARMENT COMPANY  
 1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI



Ship to: MARY ROSE  
 GAY MINETTE ALA  
 Inv. to: SAME

Invoice No. 274096

241 082560

SALESMAN NO. MO DAY YR.  
 DEPT. NO. DATE CUST ORDER NO.

TERMS: NET 10th E.O.M. GROSS THEREAFTER NET E O M 101060

DOZENS	DESCRIPTION	PRICE PER DOZEN	EXTENSION	8% DISC.	NET INVOICE
200	5742 SWTRS	5700	950	76	874
200	5734 SKIRT	5700	950	76	874
	4 D POST	128			68
	1 D				20
42	FALL LINE		1900	152	1836
					152
					1988

Black & White  
 Black

Mary of 5 X-4  
 EP

63

FILE COPY

# DORIS DODSON GARMENT COMPANY

1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI



Ship To  
**SMART SHOP**  
**BAY MINETTE ALA**

Invoice No. **274303**

**241 082560**

Bill To  
**BANK**

SALESMAN NO. MO. DAY YR.  
 DEPT. NO. DATE CUST ORDER NO.

TERMS: NET 10% E.O.M. GROSS THEREAFTER EXTRA 30 DAYS

**111060**

DOZENS	DESCRIPTION	PRICE PER DOZEN	EXTENSION	8% DISC.	NET INVOICE
220	9391 JACKET X2	9300	1550	124	1426
220	6902 SKIRT X2	6000	1150	92	1258
220	4564 BLOUSE X2	4500	750	60	690
220	4863 BLOUSE X2	4500	750	60	690
322	2700 DRESS X3	9300	2325	186	2139
322	181000 DRESS X2A1	12900	3225	258	2967
222	181264 JKT ORA2	18300	2550	204	2346
322	21089 JKT ORA3	12900	3225	258	2967
322	2700 DRESSA3	9300	2325	186	2139
	MATS AND BLOWERS				
	4				
	POST				
	INS				
	FALL LINE				
	27		17850	1428	16703

Green  
 Green  
 Camel  
 Camel  
 Black  
 Assorted  
 Green & Brown  
 Assorted  
 Bronze & Green

AUG 22 1966

1428  
 18131

11082

*April*

FILE COPY

*27*

*EP*

*MA*

DORIS DODSON GARMENT COMPANY

1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI

*Doris Dodson*  
JUNIORS

SMART SHOP

PAY MINETTE ALA

SAME

Invoice No. 274752

241 082600

SALESMAN NO. MO. DAY YR.  
DEPT. NO. DATE CUST ORDER NO.

NET 101060

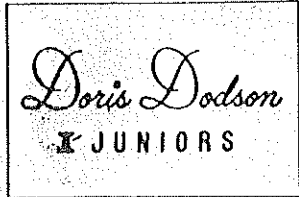
DOZENS	DESCRIPTION	PRICE PER DOZEN	EXTENSION	8% DISC. -	NET INVOICE
212	5955 SKIRT	6000	1150	92	1058
212	4589 WEENIT	4500	750	60	690
212	4566 PLOUSE	4500	750	60	690
212	21268 DRESS	13500	2550	204	2346
312	2703 DRESS	9500	2325	186	2139
	4	POST			101
	1	INS			30
112	11 5		7525	602	7054
					602
					7656

Green & Royal  
Green/Orange  
Orange  
Black  
Red, Blue & Green

FILE COPY



DORIS DODSON GARMENT COMPANY  
 1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI



Ship To  
 SMART SHOP  
 BAY MINETTE ALA

Inv. To  
 SAME

Invoice No. 275055

241 083060

SALESMAN NO. MO. DAY YR.  
 DEPT. NO. DATE CUST ORDER NO.

RMS: NET 10th E.O.M. GROSS THEREAFTER NET R O M 101060

DOZENS	DESCRIPTION	PRICE PER DOZEN	EXTENSION	% DISC.	NET INVOICE
125	A163 SKIRT	5100	637 5	54	621
125	A121 WESKIT	5100	42 5	34	391
312	2803 DRESS	10500	262 5	210	241 5
	4 PORT				81
	1 INS				20
512			372 5	298	352 8
					298
					3826

Brown/Camel  
 Brown/Camel  
 Black, Blue & Brown

5

FILE COPY

DORIS DODSON GARMENT COMPANY  
 1641 WASHINGTON AVE. • ST. LOUIS 3, MISSOURI

*Doris Dodson*  
 JUNIORS

SMART SHOP  
 BAY NINETTE ALA

Invoice No. 276777

241 090760

SAME

SALESMAN NO. MO. DAY YR.  
 DEPT. NO. DATE CUST ORDER NO.  
 3528

NET 18th E.O.M. GROSS THEREAFTER	NET P O M				101060
OZENS	DESCRIPTION	PRICE PER DOZEN	EXTENSION	% DISC.	NET INVOICE
212	21096 JKT OR 4	12900	2150	172	1979
	1	POST			74
		INS			20
212			2150	172	2372
					172
					2244

5

FILE COPY

Red & Blue

IN THE CIRCUIT COURT OF  
BAIDWIN COUNTY, ALABAMA

AT LAW

NO. 47917

DORIS DODSON GARMENT COMPANY,  
A Corporation

Plaintiff

VS

EDMUND R. CIMINO, Individually  
and EDMUND R. CIMINO d/b/a THE  
SMART SHOP

Defendant

FILED

AUG 2 1961

ALICE J. DUCK, CLERK  
REGISTER

WILTERS, BRANTLEY & NESBIT  
Attorneys at Law  
Robertsdale, Alabama

Received 2 day of July 1961  
and on 4 day of July 1961  
I served a copy of the within Edmund R. Cimino  
on Edmund R. Cimino

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. J. [Signature]  
[Signature]  
D. S.

DORIS DODSON GARMENT COMPANY, )  
A Corporation, )  
 )  
Plaintiff, )  
 )  
Vs )  
 )  
EDMUND R. CIMINO, Individually, )  
and EDMUND R. CIMINO d/b/a THE )  
SMART SHOP, )  
 )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
No. 4797

DEMURRERS

Comes now the Defendant in the above styled cause, and for answer to the Complaint heretofore filed in this cause, and to each and every count thereof, separately and severally, says as follows:

-1-

The allegations of the Complaint fail to state a cause of action.

-2-

The allegations of the Complaint are mere conclusions of the pleader.

-3-

The itemized statement of account attached to the original Bill of Complaint fail to show that the account is due and payable.

-4-

The itemized statement of account attached to the original Bill of Complaint fails to show the date that the account became due and payable.

-5-

The allegations of the Complaint fail to show how Edmund R. Cimino as an individual is responsible for the alleged debt.

*Kenneth Coape*  
Attorney for Defendant

Defendant demands a trial by jury in this cause.

*Kenneth Coape*  
Attorney for Defendant

ATTORNEY OF RECORD FOR PLAINTIFF:  
Hon Phyllis S. Nesbit  
Attorney at Law  
Robertsdale, Alabama

