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R. C. READ & CO., ING., a corporation,	Ĭ	
Plaintiff,	X	IN THE CIRCUIT COURT OF
-vs-	Q	BALDWIN COUNTY, ALABAMA,
L. E. RABON, Individually and doing business as	Ĭ	AT LAW.
RABON GROCERY, Defendant.	Ž	Let & Supple the state of the s
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COMPLAINT

COUNT I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY THREE and 80/100 (\$153.80) DOLLARS due from him by account on, to-wit, the 3rd day of November, 1960; which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY THREE and 80/100 (\$153.80) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from, to-wit, the 10th day of March, 1960, to the 23rd day of November, 1960; which sum of money with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY THREE and 80/100 (\$153.80) DOLLARS due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 21st day of November, 1960; which sum of money with the interest thereon is still unpaid.

E. G. Rickarby, Attorney for Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement of account, filed herewith.

E. G. Rickarby, Attorney for

Defendant's address is: Rabon Route, Bay Minette, Alabama.

R. C. READ & CO., INC.

WHOLESALE



JEWELRY

285 COLUMBUS AVENUE

BOSTON, MASSACHUSETTS

In account with

RABON GROCERY L. E. RABON RABON RT.

BAY MINETTE, ALA.

OCTOBER 5, 1961

DATE	ITEM	DEBITS	DATE	ITEM	CREDITS
MAR.10 ARB.27 NOV.23	1960 SHIPPED	156 80 3 50 3 50	NOV.21	1960 P.N.O,	10 00
			BALANCE	DUE\$153.80	
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Successful business demands prompt collections and prompt payments. We request prompt payments in the same courteous manner that we solicit your trade.

Both are necessary for our mutual success.

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SHIPPED TO:

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RABON GROCERY RABON HOUTE BAY KINETTE, ALABAMA

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TELEPHONE WA 8-9836

E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA

November 20, 1961

Mrs. Alice Duck Clerk of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

Re: R. C. Read & Co., Inc. Vs: L. E. Rabon, Individually and d/b/a Rabon Grocery Our File #5564

Enclosed find summons and complaint, together with itemized and verified statement and our check in the sum of \$25.00 representing court costs in the above styled matter. Please hand to sheriff and have complaint served on Mr. L. E. Rabon whose address is "Rabon Route, Bay Minette, Alabama", and oblige.

Yours very truly,

WY

Enclosures:

cc: Dup. Client

IN ACCOUNT WITH:	RABON GROCERY	NT!NUED!	A C Section	6 - 1.ASS.
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R. C. READ & CO., INC.

WHOLESALE JEWELRY BOSTON 16, MASS.

CHARGED ASON GROCERY

APR 27 50

Mail Address

BAY MINETTE

STATE OF

ALABAMA

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TERMS: Cash

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septance of these goods, all risk of loss by fire, theft, or otherwise, and all Federal and State Tax obligations are assumed by the huyer; the seller reserves a lien on said goods until full navment is made.

R. C. READ & CO., INC.

WHOLESALE JEWELRY

BOSTON 16, MASS.

CHARGED TO

RABON GROCERY

11/23/60

MAIL ADDRESS

STATE OF

ALABAMA

ESE GOODS ARE BILLED AT NET WHOLESALE PRICES. NO DISCOUNT.

DESCRIPTION OF GOODS	Number of Article	SENT RET'D KEPT	PRICE EACH	AMOUNT DOUGHT	MEMORANDUN TOTAL
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Upon acceptance of these goods, all risk of loss by fire, theft, or otherwise, and all Federal and State Tax obligations are assumed by the buyer the seller reserves a lien on said goods until full payment is made.

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BALDWIN COUNTY

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Circuit Court o	f Baldwin	Coun	ty, State o	f Alabama	, at Bay	Minette,	against $ar{oldsymbol{ol{m}}}}}}}}}}}}}}$. E.	Rabo	n,	
Individ	lually	and	doing	busine	ss as	Rabon	Groce	ry	, De	fendan	t
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·		E. G. 1	GLEGG REGGE Rickar Sox 71	eby Law	1

Plaintiff's Attorney

Defendant's Attorney

Bay Minette, Alabama RECEIVED IN OFFICE Sheriff I have executed this summons by leaving a copy with Shariff claim Sheriff Deputy Sheriff

Defendant lives at

Rabon Route

R. C. READ & CO., INC., a Corporation,

Plaintiff,

VS.

L. E. RABON, Individually and doing business as RABON GROCERY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 4941

PLEA

Now comes the Defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and each count thereof separately and severally says:

1. The allegations of the complaint are untrue.

Astorney for Defendant

Defendant demands a trial by jury of said cause.

Attorney for Defendant

DEC 21 1961

ALIGE 1. DUCK, REGISTER