

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

January 15, 1962

4997

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


Dear Mrs. Duck:

Inre: Prentice-Hall, Inc.
Vs: Lanier P. Angle
Our File: 4929

With this we are handing you Summons and Complaint,
together with itemized and verified statement of
account, along with deposit for costs in the sum of
\$25.00, in the above mentioned case.

Please process and give it to the sheriff's office
for service, and oblige.

Yours very truly,



ts

encl.

cc: (dup) Stanley K. Oldden, Inc.

PRENTICE-HALL, INC.,
A Corporation,

Plaintiff,

vs.

LANIER P. ANGLE,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

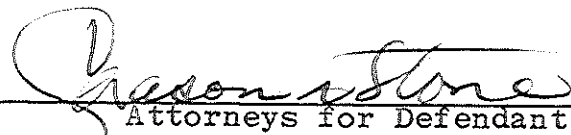
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4979

Comes the Defendant in the above styled cause and for plea to the complaint filed in said cause and each and every count thereof, separately and severally, says:

1. That the allegations of said complaint are untrue.
2. That \$33.00 of the account sued on is barred by the statute of limitations of three years.
3. That \$99.00 of the account sued on arises out of an order which the Defendant placed with the Plaintiff and which he cancelled prior to the time that such order was accepted by the Plaintiff. On October 20, 1960, the Defendant placed with a salesman of the Plaintiff an order for a Federal Tax Guide in three volumes for the total sum of \$99.00, which order stated on the face thereof that when such order is accepted by the Plaintiff it becomes a contract not subject to cancellation. On October 28, 1960, the Defendant gave notice to the Plaintiff that he desired to cancel such order, at which time the order had not been accepted by the Plaintiff. On October 31, 1960, and after notice of cancellation, the Plaintiff accepted the order and mailed certain material to the Defendant. On November 19, 1960, the Defendant notified the Plaintiff that he had cancelled the order and that he was holding the material pending their instructions for the return or disposition, which instructions were not given by the Plaintiff, hence the Plaintiff should not recover in this suit.


Attorneys for Defendant

FILED
FEB 22 1962
ALICE J. DUCK, CLERK
REGISTER

PRENTICE-HALL, INC., A
CORPORATION,

Plaintiff,

vs.

LANIER P. ANGLE,

Defendant

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4979

4999

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PLEAS

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FILED

FEB 22 1932

ALICE J. DUCK, CLERK
REGISTER

PRENTICE-HALL, INC.,
A Corporation,

Plaintiff,

- VS -

LANIER P. ANGLE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

no 499

C O M P L A I N T

Count I

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY-TWO AND NO/100 (\$132.00) DOLLARS due from him by account on, to-wit, the 1st day of October, 1961; which sum of money with the interest thereon is still unpaid.

Count II

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY-TWO AND NO/100 (\$132.00) DOLLARS due from him for merchandise, goods and chattel sold by the Plaintiff to the Defendant between the 3rd day of December 1957 and the 1st day of October, 1961; which sum of money with the interest thereon is still unpaid.


Count III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY-TWO AND NO/100 (\$132.00) DOLLARS due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 1st day of October, 1961; which sum of money with the interest thereon is still unpaid.


Attorney for Plaintiff

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

FILED
JAN 17 1962
ALICE J. DUCK, CLERK
REGISTER


Attorney for Plaintiff

Defendant's Address:
321 Fairhope Avenue
Fairhope, Alabama

State of New Jersey
City of Englewood Cliffs } ss.
County of Bergen

1 F. C. Feus
being duly sworn, doth depose and say, that he is 2 Assistant Treasurer OF

Prentice-Hall Inc.,
Lanier P. Angle, that the annexed statement of the account of

lately doing business at 321 Fairhope Ave., Fairhope
in the State of Alabama is just, true and correct, that there is now due
the sum of one hundred thirty two and 00/100 Dollars,
(Plus interest to date)
that no part thereof has been paid or satisfied, and that there are no set offs, or counterclaims thereto
to the knowledge or belief of deponent.

X

F. C. Feus

Sworn to before me, this 4th
day of October, 1961 }
NP



NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 2, 1964

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4979

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lanier P. Angle

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, State of Alabama, at Bay Minette, against

Lanier P. Angle

, Defendant

by Prentice-Hall, Inc

, Plaintiff

Witness my hand this 17th day of January 19 62

Ex-2-3-62

Alice J. Duck, Clerk

4999
No. ~~1879~~ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

PRENTICE -HALL, INC

vs.

Plaintiffs

LANIER P. ANGLE

Defendants

SUMMONS and COMPLAINT

Filed 1-17 62, 19 _____

Alice J. Duck, Clerk

E. G. Rickarby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Shope
RECEIVED IN OFFICE

Jan 17, 19 *62*

_____, Sheriff

I have executed this summons

this *3 Feb*, 19 *62*

by leaving a copy with

Lanier P. Angle

Sheriff claims *70* miles at

Ten Cents per mile Total \$ *7.00*

TAYLOR WILKINS, Sheriff

BY *W. O. Garner*
DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. O. Garner Deputy Sheriff
Shope