

LAW OFFICES  
**E. G. RICKARBY**  
392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

August 9, 1963

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

Dear Mrs. Duck:

Inre: Pacific Texbanc Inc.  
VS: Town & Country Shops  
Our File: 63-142

With this letter we are sending you summons and  
complaint, itemized statement, and deposit for  
costs.

Please process and oblige.

Yours very truly,



EGR/ms  
Enc. (3)  
cc: House of Adjustments

5662

STATE OF ALABAMA  
COUNTY OF BALDWIN

CIRCUIT COURT, BALDWIN COUNTY  
NO. \_\_\_\_\_ TERM, 1963

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon BESSIE K. BALES, Individually, and doing business as TOWN AND COUNTRY SHOPS, 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 BESSIE K. BALES, Individually, and doing business as TOWN AND COUNTRY SHOPS, Defendant, by PACIFIC TEXBANC INC., a Corporation, Plaintiff.

WITNESS my hand this 102 day of August 1963

Alice L. Duck Clerk

PACIFIC TEXBANC INC., a  
Corporation,

Plaintiff,

Vs

BESSIE K. BALES, Individually  
and doing business as TOWN AND  
COUNTRY SHOPS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW.

5662

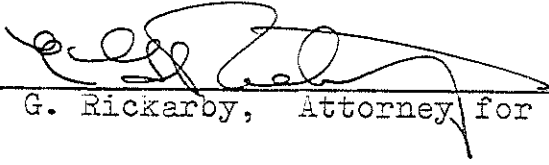
C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FIFTY SIX AND 28/100 (\$556.28) DOLLARS, due from her by account between the Defendant and SEA FASHIONS, A CORPORATION, on the 31st day of May 1962, which sum of money with the interest thereon is still unpaid and is the property of the Plaintiff. The account sued on is evidenced by an itemized and verified statement of account filed herewith.

COUNT II

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED FIFTY SIX AND 28/100 (\$556.28) DOLLARS due from her for merchandise, goods and chattels sold by SEA FASHIONS, a Corporation to the Defendant between the 24<sup>th</sup> day of January 1962 and the 31st day of May 1962, which sum of money with the interest thereon is still unpaid, and is the property of the Plaintiff.

  
\_\_\_\_\_  
E. G. Rickarby, Attorney for Plaintiff

FILED

AUG 12 1963

ALICE J. DUCK, CLERK  
REGISTERED

EX-8-14-63

State of California  
County of Los Angeles

ss.:  
1943

Be it Remembered, that on this 19th day of June A. D., 1943

personally appeared before me, the undersigned authority, Joseph Rizzo  
known to me who being duly sworn, upon his oath stated that he is Vice President  
of Pacific Texbanc Inc.

a corporation organized and doing business under the laws of the State of Delaware  
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

; that the attached account against  
Town and Country of Fairhope, Alabama

is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said  
account were sold and delivered to said Pacific Texbanc Inc.

at his special instance and request; that credit has been duly given for all payments and just and  
their lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to  
its the sum of Five Hundred Fifty Six and 28/100 Dollars (\$556.28)  
with interest thereon from 19, is justly due and remains unpaid.

Sworn to and subscribed before me on the day and year first above stated.

In Witness Whereof, I have hereunto set my hand and official seal:

Barnett A. Schulman  
County of Los Angeles State of California Notary Public.  
My commission expires 1943 A. D., 1943

my commission expires November 10, 1936

5662

Pacific Teabanc Inc.

VS -

Bessie K. Bales Ind.

vd/H/a.

Received 12 day of Aug 1963  
and on 14<sup>th</sup> day of Aug 1963

I served a copy of the within S & C  
on Bessie K. Bales

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

TAYLOR WILKINS, Sheriff  
By Fred Seibert D.  
F. H. H. H.

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
By Fred Seibert  
DEPUTY SHERIFF

FILED

AUG 12 1963

ALICE J. DUCK, CLERK  
REGISTER

STATE OF CALIFORNIA )  
CITY OF LOS ANGELES :  
COUNTY OF LOS ANGELES)

Joseph Rizzo being duly sworn, deposes and says:  
That he is Vice President of Pacific Texbanc Inc.  
a corporation organized and existing under the laws of the  
State of Delaware and having its principal office and place  
of business at No. 111 West 7th Street, Los Angeles, California.

THAT Town and Country, Fairhope, Alabama  
is indebted to said Pacific Texbanc Inc. in the sum  
of Five Hundred Fifty Six 28/100 dollars  
as specified in the statement of account attached hereto; that  
the consideration for said indebtedness is merchandise sold and  
delivered to Town and Country, Fairhope, Alabama  
at (his) (its) (her) request by Sea Fashions of California  
that simultaneously with the sale of such goods the accounts  
receivable arising therefrom were assigned to and purchased  
by said Pacific Texbanc Inc. for cash with notice of  
assignment to the aforementioned buyer on the original invoice;

That the said sum is now justly due to said  
Pacific Texbanc Inc. that no payment has been made thereon,  
and there are no offsets against said sum to the knowledge of  
this deponent, and said Pacific Texbanc Inc. has not,  
nor has any person by its order, or to the knowledge or belief  
of your deponent for its use, had or received any manner of  
security whatsoever for the payment of said indebtedness.

Joseph Rizzo VP

Sworn to before me this

18 day of June, 1963

Helen A. Kirkman

HELEN A. KIRKMAN  
My Commission Expires November 19, 1965

Date June 18 1961

PACIFIC TEXTBANC, Inc.

111 West 7th Street

LOS ANGELES, CALIF.

Place and Country

Mobile, Alabama

FOR GOODS PURCHASED FROM

See Invoices

PLEASE FURNISH NAME OF SUPPLIER WITH YOUR CHECK

INVOICE DATE	INVOICE CODE	DUE	PURCHASED FROM CODE	AMOUNT
6/2				
1/24		7/10		121.80
5/8		7/10		365.78
3/31		7/10		69.45
				556.28

CODE—1-Credit Memo 2-Cash Credit 3-Unadjusted Claim 4-Interest Due 5-Short Payment

SW

# SEA FASHIONS

FACTORY

11500 BLVD

LOS ANGELES, CALIF.

 TEL. 451-8337  
 5068 10 837

 Sold  
 To

*Town & Country Shop  
 Fair Hope,  
 Alabama*

No. 6074

Jan. 24, 1962

By. Exp. 2nd Class

 For Returns Accepted Without Written  
 Consent of These General Offices

 See also Section 1019e, Public Law 85-623  
 and the Federal Trade Commission

PACKAGE

 ① *Lapira*

 PAYABLE TO  
 TOWN & COUNTRY SHOP  
 FAIR HOPE, ALA.

No. 2.D.M. as 5/25

 CALIFORNIA  
 JAMES  
 10/1/62

STYLE NO.

1332/34	3/2
1402	3/2
1921	3/2
1500	3/2
1502	3/2
1602	3/2
1606	3/2
1623	3/2
1700	3/2
1702	3/2
1709	3/2
1805	3/2

Asst.

PLACED FOR  
 COLLECT

*bal. of order to follow*

DATE

8 JUL 10

81 00	27 -
57 00	28 50
27 00	28 50
29 00	34 50
69 00	34 50
87 00	21 -
81 00	21 -
87 00	21 -
93 00	31 -
93 00	31 -
93 00	31 -
105 00	35 -

362 -
378
365 78

JUN 11 1962

INVOICE

No. 6074 C

DEC 20 1962

DUPLICATE INVOICE

4



SWIM

# sea fashions

OFFICE - FACTORY  
 1400 WASHINGTON BLVD.  
 LOS ANGELES 15, CALIF.  
 TEL. 551-7431  
 FAX 551-5068

Sold To

*Town & Country Shop  
 Fair Hope,  
 Alabama*

INVOICE No. 6074  
*Jan. 24, 1962*  
*By. Exp. 2nd Ch*  
 Registered, Accepted by the U.S. Patent Office  
 Copyright from General Offices  
 U.S. Patent Office, U.S. Patent Office, U.S. Patent Office  
 U.S. Patent Office, U.S. Patent Office, U.S. Patent Office

PACKAGE

①

SALTMAN  
*Sapira*

PAYABLE TO PAY  
 TO WHOM THIS A  
 FUNDS AT PAR

*8402 D.M. As 5/2*

STYLE NO.

D-2

1332/340	1/2
1402	1/2
1424	1/2
1500	1/2
1502	1/2
1602	1/2
1606	1/2
1623	1/2
1700	1/2
1702	1/2
1704	1/2
1805	1/2

*Ass't.*

PLACED FOR  
 COLLECT

DATE

8 JUL 10

81.00	27	-
57.00	28	50
27.00	28	50
29.00	34	50
69.00	34	50
87.00	21	-
81.00	27	-
81.00	27	-
93.00	31	-
93.00	31	-
93.00	31	-
105.00	35	-

JUN 11 1962

No. 6074 C

DEC 20 1962

DUPLICATE INVOICE

4

362 -  
 37  
 365 7

SWIMSUIT

# SEA FASHIONS

GENERAL OFFICE • FACTORY  
4012 WASHINGTON BLVD.  
LOS ANGELES 15, CALIF.  
TEL. MA dion 7-4151  
T.W.X. - N.Y. - 1 - 5068 **837**

INVOICE No. 6074 C  
DATE *Jan. 24, 1962*  
VIA *Ry. Exp. 2nd class*  
No Returns Accepted Without Written  
Consent from General Offices

*Town & Country Shop  
Fair Hope,  
Alabama*

① *Sepira*

*440 L.O.M. As 5/25*

BE ADDED TO PACIFIC TELEPHONE CO. ACCOUNT  
TO WHICH THIS ACCOUNT HAS BEEN CHARGED  
FURNISHING PAP. AND OTHERS

STYLE NO.	SIZE	DESCRIPTION	PRICE	QUANTITY	AMOUNT	TOTAL
<i>1332/34</i>	<i>3/2</i>	<i>Asst.</i>	<i>81.00</i>	<i>27</i>	<i>-</i>	
<i>1402</i>	<i>3/2</i>		<i>57.00</i>	<i>28</i>	<i>50</i>	
<i>1921</i>	<i>3/2</i>		<i>57.00</i>	<i>28</i>	<i>50</i>	
<i>1500</i>	<i>3/2</i>		<i>57.00</i>	<i>34</i>	<i>50</i>	
<i>1502</i>	<i>3/2</i>		<i>61.00</i>	<i>34</i>	<i>50</i>	
<i>1602</i>	<i>3/2</i>		<i>87.00</i>	<i>21</i>	<i>-</i>	
<i>1606</i>	<i>3/2</i>		<i>81.00</i>	<i>27</i>	<i>-</i>	
<i>1623</i>	<i>3/2</i>		<i>81.00</i>	<i>27</i>	<i>-</i>	
<i>1700</i>	<i>3/2</i>		<i>93.00</i>	<i>31</i>	<i>-</i>	
<i>1702</i>	<i>3/2</i>		<i>93.00</i>	<i>31</i>	<i>-</i>	
<i>1704</i>	<i>3/2</i>		<i>93.00</i>	<i>31</i>	<i>-</i>	
<i>1805</i>	<i>3/2</i>		<i>105.00</i>	<i>35</i>	<i>-</i>	
					<i>362</i>	<i>-</i>
					<i>898</i>	
					<i>365</i>	<i>78</i>

PLACED FOR  
COLLECT

DATE  
**8 JUL 10**

JUN 11 1962

INVOICE  
6074 C

DEC 20 1962

DUPLICATE INVOICE