

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

November 6, 1963

5-803

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

Dear Mrs. Duck:

Re: Keating of Chicago, Inc.
Vs: Joseph R. Gillespie
Our File: 63-212

Enclosed find Summons and Complaint and Itemized
and Verified statement of account, both in dupli-
cate, and deposit for cost in the sum of \$25.00.

Please process and oblige.

Yours very truly,



EGR/ms
Enclosures
Dup: Max & Herman Chill
11-20-63

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

July 21, 1964

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

Dear Mrs. Duck:

Re: Keating of Chicago, Inc.
Vs: Joseph Gillespie
Our File: 63-212

Request you enter up judgment by default in the the
above styled cause on the principal of \$368.20, plus
interest in the sum of \$44.18, making a total of
\$412.38, and render said judgment on an itemized and
verified statement of account.

Please have the certificate recorded and return to
me, and oblige.

Yours very truly,



ts

8.21.64

cc: Messrs. Max & Herman Chill

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 JOSEPH R. GILLESPIE, Individually, and doing business as NORTH ALABAMA CHINA COMPANY, to appear and plead, answer or demur, within thrity days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against JOSEPH R. GILLESPIE, Individually, and doing business as NORTH ALABAMA CHINA COMPANY, Defendant, by KEATING OF CHICAGO, INC., A Corporation, Plaintiff.

WITNESS my hand this 7 day of Nov 1963
Glenn S. Duck Clerk

KEATING OF CHICAGO, INC., a Corporation,	Ø	
Plaintiff,	Ø	IN THE CIRCUIT COURT OF
VS-	Ø	BALDWIN COUNTY, ALABAMA,
JOSEPH R. GILLESPIE, In- dividually, and doing business as NORTH ALABAMA CHINA COMPANY,	Ø	AT LAW.
Defendant.	Ø	
	Ø	

5883

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum or FOUR HUNDRED FORTY ONE AND 84/100 (\$441.84) DOLLARS, due from the Defendant by check drawn by the Defendant on the First National Bank, Huntsville, Alabama in favor of Plaintiff in the sum of THREE HUNDRED SIXTY EIGHT AND 20/100 (\$328.20) DOLLARS, on to-wit the 25th day of March 1963, which check was duly presented and payment refused, and Plaintiff avers that by reason of said check, it was necessary to employ an attorney to collect said check, and that the sum of SEVENTY THREE AND 64/100 (\$73.64) DOLLARS is a reasonable fee for said attorney, which Plaintiff further claims, which sums of money, with the interest thereon, are still due and unpaid.

KEATING OF CHICAGO, INC.

FORMERLY FRYING EQUIPMENT AND SUPPLY CO.

1210 WEST VAN BUREN STREET, CHICAGO 7, ILLINOIS

PHONE 829-68

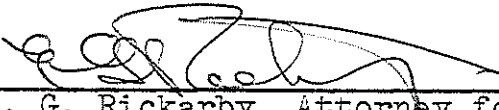
North Alabama China Company
3014 University Drive
Huntsville, Alabama

August 2, 1963

DATE	CHARGES	CREDITS	BALANCE
BALANCE FORWARD			
	Fryer 81381 TS 14 W/Split Baskets		
June 26'62 9916	368.20		368.
Mar 13'63 CS		368.20*	
Mar 26'63 NSF CHECK	368.20*		368.
<p>I certify that I am Secretary of Keating of Chicago Inc. and that the above is a true and complete record of the amount due and owing to this Company.</p>			
		<i>Rose Gustafson</i> Secretary	

COUNT II

The Plaintiff claims of the Defendant the sum of
THREE HUNDRED SIXTY EIGHT AND 20/100 (\$368.20) DOLLARS,
due from him by account on to-wit: the 26th day of June,
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.



E. G. Rickarby, Attorney for Plaintiff

FILED

NOV 7 1962

ALICE J. DUCK, CLERK
REGISTER

64-5-28-64

STATE OF ILLINOIS)
) SS:
COUNTY OF C O O K)

ROSE GUSTAFSON, being first duly sworn, deposes and
says:

1. That she is the Secretary of KEATING OF CHICAGO, INC.,
an Illinois Corporation, has knowledge of the facts related
herein and that the same are true.
2. That on or about June 26, 1962, KEATING OF CHICAGO, INC.,
sold and delivered to JOSEPH GILLESPIE, who held himself out
to be the owner of NORTH ALABAMA CHINA COMPANY, a fryer described
as: "Fryer 81381 TS 14 W/Split Baskets", for the sum of
\$368.20.
3. That on or about March 13, 1963, KEATING OF CHICAGO,
INC., received from JOSEPH GILLESPIE, his personal check in the
sum of \$368.20, drawn on the First National Bank of Huntsville,
Alabama and that on or about March 26, 1963 said check was
returned unpaid with the notation that the account was closed.

Further affiant saith not.

Rose Gustafson

Subscribed and sworn
to before me this 24th day
of October, 1963

Alfred Cohen
NOTARY PUBLIC
Chgo Ill

11-7-63
B. M. S. O.

After careful search the within named
party cannot be located in our county.

L. Swall, Sheriff
MADISON COUNTY, ALABAMA

J. B. Harwell
Deputy Sheriff

This man is no longer
in Huntsville

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY: J. B. Harwell
Deputy Sheriff
Received day of May 1963

on 28th day of May 1963

Received a copy of the within

Joseph R. Gillespie

service on

TAYLOR WILKINS
By: J. B. Harwell
9/1/63

D. E.

5803

Keating of Chicago.
Inc. a corp.

US -

Joseph R. Gillespie
ind & d/b/a. North Ala.
China Co

102 No. Bayview

FILED

NOV 7 1963

ALICE J. DUCK, CLERK
REGISTER

E. G. Rickard