

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

P. O. BOX 71

May 27, 1963

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

Dear Mrs. Duck:

Re: Jones & Laughlin Steel Corporation
Vs: Thomas A. Smith, Ind. & dba Fall-Out Shelters
Case No. 5539
Our File No. 63-46

Request judgment by default on the itemized and
verified statement of account for \$1,256.97,
principal, and \$119.41, interest, making a total
of \$1,376.38. Request you have certificate of
judgment recorded for me and oblige.

Yours very truly,



EGR/wrt

ccs: Allyn M. Schiffer, Inc.
770 Lexington Avenue
New York 21, New York

Jones & Laughlin Steel Warehouse Division
Jones & Laughlin Steel Corporation
P. O. Box 66
New Orleans 6, Louisiana

6/27/63

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

P. O. BOX 71

April 9, 1963

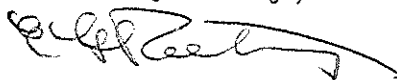
Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Jones & Laughlin Steel Corporation
Vs: Thomas A. Smith, Ind. & d/b/a Fall-Out Shelters
Our File: 63-46

Enclosed find summons and complaint, together with
check for \$25.00 representing court costs in the
above styled cause. Please process, advise when
defendant has been served and oblige.

Yours very truly,



wrt
encl.
5/9/63
cc: (dup.) Client

JONES & LAUGHLIN STEEL
CORPORATION, a corporation,

Plaintiff,

V.S.

THOMAS A. SMITH, Individually
and doing business as FALL-OUT
SHELTERS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.
CASE NO. 5539

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE THOUSAND TWO HUNDRED FIFTY-SIX AND 97/100 (\$1,256.97) DOLLARS, due from him by account on, to-wit, the 28th day of October, 1961; which sum of money with the interest thereon is still unpaid. 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 ONE THOUSAND TWO HUNDRED FIFTY-SIX AND 97/100 (\$1,256.97) DOLLARS, due from him on account stated between the Plaintiff and the Defendant on, to-wit, the 25th day of April, 1962; which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED TWENTY-FIVE AND 08/100 (\$525.08) DOLLARS, damages, for that on, to-wit, the 19th day of September, 1961, the Defendant duly made, executed and delivered to the Plaintiff that certain guarantee whereby the Defendant guaranteed the payment to the Plaintiff of the material furnished K & G Enterprises to fabricate certain fallout shelters, a copy of said guarantee being attached hereto and marked Exhibit "A" and made a part hereof; that thereafter, in consideration of the aforesaid guarantee, on, to-wit, the


21st and 26th days of September, 1961; the Plaintiff sold to K & G Enterprises goods shown by the attached invoices, copies of which are attached hereto and made a part hereof and marked Exhibit "B", for one (1) fallout shelter, No. 816, for display in Pensacola, Florida; one (1) fallout shelter, project No. 816, for Mr. and Mrs. W. J. Nettles, Pensacola, Florida; one (1) fallout shelter, project No. 816, for Mr. Robert E. Haynes; for the sum of FIVE HUNDRED TWENTY-FIVE AND 08/100 (\$525.08) DOLLARS, and that no part or portion of said sum has been paid and the whole thereof remains now due, owing and unpaid from Defendant to Plaintiff.

COUNT IV

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED THIRTY-ONE AND 89/100 (\$731.89) DOLLARS, damages, for that on, to-wit, the 28th day of September, 1961, the Defendant guaranteed the payment to the Plaintiff of the materials furnished in the manufacture of a fallout shelter purchased by Mr. and Mrs. Clifton Bell.

That thereafter, and in consideration of said guarantee, on, to-wit, the 3rd day of October, 1961, the Plaintiff sold to K & G Enterprises goods shown by the attached invoices marked Exhibit "C" and made a part hereof, for the manufacture of a fallout shelter purchased by Mr. and Mrs. Clifton Bell for the sum of SEVEN HUNDRED THIRTY-ONE AND 89/100 (\$731.89) DOLLARS.

That no part or portion of said sum has been paid and the whole thereof remains now due, owing and unpaid from the Defendant to the Plaintiff.


E. G. RICKARBY, Attorney for Plaintiff.

FILED

APR 21 1963

ALICE A. DICK, CLERK
CLERK

185

Exhibit A

Meadowbrook Homes, Inc.

PHONE 523-2106 • 1802 PERDIDO STREET • NEW ORLEANS 12, LOUISIANA
Sales Office: PHONE ST. 4-6622 • P. O. BOX 157 • LULING, LOUISIANA

September 19, 1961

Jones & Laughlin Steel Corporation
P.O. Box 66
New Orleans 6, Louisiana

Att: Mr. F. J. Deloup

Dear Sir:

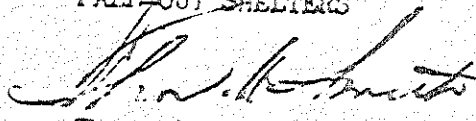
This letter is in confirmation of our conversation over the telephone this date. We have placed orders for fall-out shelters with Mr. W. A. Kinchen of K & G Enterprises as follows:

- (1) One fall-out shelter, project #816 for display in Pensacola, Florida
- (2) One fall-out shelter, project #816 for Mr. and Mrs. W. J. Netiles, Pensacola, Florida
- (3) One fall-out shelter, project #816 for Mr. Robert E. Haynes.

We would appreciate your furnishing K & G Enterprises with the raw material necessary to fabricate these shelters, not to exceed \$1600.00 for the three shelters. We will guarantee payment for these materials and the check will be made jointly to your firm and K & G Enterprises, payable in thirty days from date of order or on completion of installation of shelters.

Very truly yours,

FALL-OUT SHELTERS


Thos. A. Smith, Manager

P.S. Please mail any future correspondence to our local address, P.O. Box 157, Luling, Louisiana.

TAS/fo

CC: W. A. Kinchen

CC: R. B. Smith

P.O. Box 3237, Pensacola, Florida

STATEMENT OF ACCOUNT
JONES & LAUGHLIN STEEL WAREHOUSE DIVISION
 JONES & LAUGHLIN STEEL CORPORATION

41. P. O. BOX 7400A
CHICAGO 80, ILL.45. 16500 ROCKSIDE ROAD
CLEVELAND 37, OHIO48. P. O. BOX 26, OKOLONA BR.
LOUISVILLE 19, KY.51. P. O. BOX 50066
NEW ORLEANS 6, LA.43. 11501 READING ROAD
CINCINNATI 41, OHIO46. P. O. BOX 1053
INDIANAPOLIS 6, IND.49. P. O. BOX 272
MEMPHIS 1, TENN.53. 26TH AND JANE STS.
PITTSBURGH 30, PA.44. 12301 HUBBELL AVE.
DETROIT 27, MICH.47. P. O. BOX 119
LANCASTER, PA.50. P. O. BOX 7291 S. STATION
NASHVILLE 10, TENN.

REMIT TO

WHSE. NO. 51

CUSTOMER NO.

999885

Thomas A. Smith
~~K & C Enterprises~~
~~9309 River Lane~~
~~New Orleans, Louisiana~~

DATE

October 31, 1962

DIRECT INQUIRY CONCERNING
 THIS STATEMENT TO:

ACCOUNTS RECEIVABLE

DEPARTMENT

#3 GATEWAY CENTER
 PITTSBURGH 30, PA.

CODE

1. OUR CREDIT MEMO
2. SALES TAX DEDUCTION
3. OTHER CUSTOMER DEDUCTIONS
4. CASH DISCOUNT
5. UNAPPLIED REMITTANCE
7. PAYMENT ON ACCOUNT
8. CONTRA



INVOICE				CODE	CHARGES	CREDITS	BALANCE
DATE		NUMBER					
9	21	61	64335		\$ 461.97		\$1,256.97
9	26	61	64467		63.11		
10	03	61	64670		692.75		
10	04	61	64723		39.14		

JONES & LAUGHLIN STEEL WAREHOUSE DIVISION

JONES & LAUGHLIN STEEL CORPORATION

Exhibit "B"

REMIT TO:

NEW ORLEANS WAREHOUSE
P. O. BOX 66
NEW ORLEANS 6, LOUISIANA
WHITEHALL 5-1131



SOLD TO
K AND G ENTERPRISES
2309 RIVER LANE
NEW ORLEANS 23 LOUISIANA

SAVE AIRLINE HWY (HALF
MILE PAST SPILLWAY RIGHT
SIDE OF ROAD, JUNK YARD)

WAREHOUSE ORDER NO.	CUSTOMER'S ORDER NO. AND DATE	INVOICE DATE	INVOICE NO.	SALESMAN-AGENCY	CUSTOMER CODE
7155	MARKINCHEN 9-18-61	9-21-61	51-64335	B 4536	999290
TERMS	10 DAYS NET 30 DAYS	PREPAID	COLLECT	F. O. B.	ROUTE
1/2				N O	OUR TRUCK
OR \$	ON \$				DATE SHIPPED
					9-20-61

QUANTITY PIECES	DESCRIPTION	LENGTH		WEIGHT LBS.	PRICE 100#	AMOUNT
		FEET	INCHES			
3	H R SHT 10 0 X 72	20	0	20 25	879	178 00
1	H R SHT 10 0 X 60	16	0	4 50	897	40 37
1	DO	10	0	2 81	872	24 50
6	H R SHT 10 0 X 36	10	0	10 13	866	87 73
1	H R SHT 14 0 X 48	8	0	1 00	879	8 79
3	L 2 X 2 X 1/2	20	0	1 91	900	17 19
10	L 3 X 3 X 1/2	20	0	8 20	875	71 75
5	H R STRIP 1/8 X 1	20	0	43	11 51	4 95
5	H R FL 1/2 X 2	20	0	1 70	896	15 23
				50 93		448 51
	STATE OF LA S&U TAXES				02	8 97
	JEFF DARIEN S&U TAX 1%				01	4 49
						461 97
	HARK FALLOUT SHELTER FOR WRAHNS W J NETTLES PENSACOLA FLA.					

JONES & LAUGHLIN STEEL WAREHOUSE DIVISION

JONES & LAUGHLIN STEEL CORPORATION

Exhibit "B"

REMIT TO:

NEW ORLEANS WAREHOUSE
P. O. BOX 66
NEW ORLEANS 6, LOUISIANA
WHITEHALL 5-1131



SOLD TO
K AND G ENTERPRISES
9509 RIVER LANE
NEW ORLEANS 23 LOUISIANA

WILL CALL

WAREHOUSE ORDER NO. 7259	CUSTOMER'S ORDER NO. AND DATE 9-22-61	INVOICE DATE 9-26-61	INVOICE NO. 51-64467	SALESMAN AGENCY 4335	CHECK CODE 99229
TERMS $\frac{1}{2}$	% 10 DAYS NET 30 DAYS	PREPAID	COLLECT	F. O. B. DATE 9-22-61	ROUTE CUST TRUCK
OR \$	ON \$				

QUANTITY PIECES	DESCRIPTION	LENGTH		WEIGHT LBS.	PRICE 100#	AMOUNT
		FEET	INCHES			
36	1/8 X 7 JALTHREAD FL PL SEND TO THREAD PLUS BENDING 36 @ .50 EA. STATE OF LA 8% TAX JEFF PARISH 8% TAX 1%	3	0	385	1124	43 27
						18 00
					02 01	61 27 1 23 61
						63 11

MATERIALS COVERED BY THIS INVOICE WERE PRODUCED IN CONFORMITY WITH THE FAIR LABOR STANDARDS ACT OF 1938, AS AMENDED.

JONES & LAUGHLIN STEEL WAREHOUSE DIVISION

JONES & LAUGHLIN STEEL CORPORATION

Exhibit "C"

REMIT TO:

NEW ORLEANS WAREHOUSE
P. O. BOX 66
NEW ORLEANS 6, LOUISIANA
WHITEHALL 5-1131



SOLD TO
M AND G ENTERPRISES
9309 RIVER LANE
NEW ORLEANS 23 LOUISIANA

SHIP TO
SAME AIRLINE HWY (HALF MILE
PAST SPILLWAY RIGHT SIDE OF
RD. JUNK YARD)

WAREHOUSE ORDER NO. 7485	CUSTOMER'S ORDER NO. AND DATE MR KINCHEN 9-25-61	INVOICE DATE 10-3-61	INVOICE NO. 51-64670	SALESMAN-AGENCY 8 4536	CUSTOMER CODE 999299
TERM: 1/2	10 DAYS NET 30 DAYS	PREPAID	COLLECT	F. O. B. N O	ROUTE OUR TRUCK
DATE SHIPPED 10-3-61					

QUANTITY PIECES	DESCRIPTION	LENGTH		WEIGHT LBS.	PRICE 100#	AMOUNT
		FEET	INCHES			
1	HR SHT 10 G X 72	20	0	6 75	879	59 33
1	HR SHT 10 G X 60	16	0	4 50	897	40 37
4	HR SHT 10 G X 60	14	0	15 75	897	141 28
4	HR SHT 10 G X 60	12	0	13 50	872	117 72
1	HR SHT 10 G X 60	10	0	2 81	872	24 50
6	HR SHT 10 G X 36	10	0	10 13	866	87 73
3	L 2 X 2 X 1/4	20	0	1 91	900	17 19
17	L 3 X 2 X 1/4	20	0	13 94	875	121 98
15	HR FL 1/2 X 2	20	0	5 10	896	45 70
5	L 1 X 1/2 X 1/8	20	0	84	1025	8 61
5	HR L 1/2	20	0	85	960	8 16
				76 08		673 57
	STATE OF LA S&U TAX 2%				02	13 45
	JEFF DANISH S&U TAX 1%				01	6 73
						692 75

FOR MR & MRS CLIFTON BELL 1902 NORTH ALCANTIA
PENSACOLA FLA.

JONES & LAUGHLIN STEEL WAREHOUSE DIVISION

JONES & LAUGHLIN STEEL CORPORATION

Exhibit "C"

REMIT TO:

NEW ORLEANS WAREHOUSE
P. O. BOX 66
NEW ORLEANS 6, LOUISIANA
WHITEHALL 5-1131



SOLD TO
K AND G ENTERPRISES
9309 RIVER LANE
NEW ORLEANS 2 3 LOUISIANA

SHIP TO
SAME AIRLINE HWY HALF MILE
PAST SPILLWAY RIGHT SIDE
OF ROAD JUNKYARD

WAREHOUSE ORDER NO.	CUSTOMER'S ORDER NO. AND DATE	INVOICE DATE	INVOICE NO.	SALESMAN-AGENCY	CUSTOMER CODE
W0544 7509	VERBAL 9-29-61	10-4-61	51-64723	S 4336	999299
TERMS	10 DAYS NET 30 DAYS	PREPAID	COLLECT	F. O. B.	ROUTE
3/2				JOB SITE	OUR TRUCK
OR \$	ON \$				DATE SHIPPED
					10-3-61

QUANTITY PIECES	DESCRIPTION	LENGTH		WEIGHT LBS.	PRICE 100#	AMOUNT
		FEET	INCHES			
22	JALTREAD FL PLS 1/8 X 7 BEND AS PER INSTRUCTIONS STATE OF LA S&U TAX 2% JEFF PARISH S&U TAX 1%	3	0	235	LUMP	38 00
					02	76
					01	38
						39 14
	MARK FALL OUT SHELTER FOR MR AND MRS CLIFTON BELL 1902 NORTH ALEANIZ PENSACOLA, FLORIDA					

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Thomas A. Smith

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 THOMAS A. SMITH,
Individually and doing business as FALL-OUT SHELTERS, Defendant.
by JONES & LAUGHLIN STEEL CORPORATION, a corporation

_____, Plaintiff

Witness my hand this 11 day of April 1963

Exp. 4-27-63
Alice J. Welch Clerk

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Thomas A. Smith

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 THOMAS A. SMITH,
Individually and doing business as FALL-OUT SHELTERS, Defendant.
by JONES & LAUGHLIN STEEL CORPORATION, a corporation

Plaintiff.

Witness my hand this

11

day of

April

1963

Clerk

Exp. 4-27-63

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

JONES & LAUGHLIN STEEL

CORPORATION, a corporation

Plaintiffs

vs.

THOMAS A. SMITH, Individually
and d/b/a FALL-OUT SHELLERS
Defendants

SUMMONS and COMPLAINT

Filed _____, 19____

APR 11 1963

Clerk

ALICE J. DICKY, CLERK
REGISTER

E. G. Rickarby
Attorney at Law
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Lillian, Alabama

RECEIVED IN OFFICE

April 11, 1963

Sheriff

I have executed this summons

this 4-27-63, 19____

by leaving a copy with

Thomas A. Smith
and d/b/a Fall-Out Shellers

Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Lillian

STATE OF Pennsylvania } ss
County of Allegheny }

E. J. Keller being duly sworn, deposes and says that he has knowledge

of the facts hereinafter set forth; that he makes this affidavit for and in behalf of JONES & LAUGHLIN STEEL CORPORATION, 3 Gateway Center, Pittsburgh 30, Pennsylvania

that K&G Enterprises, & Thomas A Smith justly indebted to said JONES & LAUGHLIN STEEL CORPORATION

in the sum of One thousand, two hundred fifty-six and ⁸⁷/₁₀₀ ----- Dollars,

over and above and after allowing all just credits, deductions and legal set-offs; that said amount is due and wholly unpaid, that the considerations therefor was goods and merchandise sold and delivered, that "Exhibit A" hereunto annexed is a true and correct account taken from the books of original entry of said claimant, and that no part of said debt is for usurious interest.

Sworn to and subscribed before me, this 3/26 }
day of October, 1962 E. J. Keller, Assistant Treasurer
Warehouse Division

Notary Public.

JOSEPH D. SWEARINGEN, Notary Public
Pittsburgh, Allegheny County, Pa.
My Commission Expires
February 11, 1965