

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA
P. O. DRAWER 180

June 22, 1963

Hon. H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Benrus Watch Co., Inc.
Vs: C. H. Matthews, d/b/a
Case No. 5569

Attention: Mrs. Alice J. Duck

Dear Judge Hall:

Kindly render a default judgment in this case in the amount
of \$391.00.

Cordially yours,


FOREST A. CHRISTIAN

SUMMONS

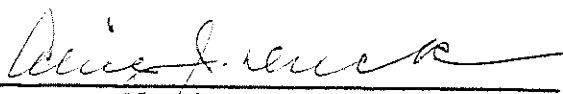
THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon C. H. MATTHEWS, d/b/a MATTHEWS FURNITURE COMPANY, 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, Alabama, at the place of holding same by BENRUS WATCH COMPANY, INC., and as assignee of BELFORTE WATCH COMPANY, INC., a New York corporation.

Witness my hand this the 16 day of May, 1963.


Clerk

84-5-21-63

COMPLAINT

BENRUS WATCH COMPANY, INC.,)
and as assignee of BELFORTE)
WATCH COMPANY, INC., a New)
York corporation,)

PLAINTIFF)

VS:)

C. H. MATTHEWS, doing business)
as MATTHEWS FURNITURE COMPANY,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY AND 00/100 (\$340.00) DOLLARS, due from him by account on, to wit: the 22nd day of December, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY AND 00/100 (\$340.00) DOLLARS, due from him on account stated between the Plaintiff and the defendant on, to wit: the 22nd day of December, 1960, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant THREE HUNDRED FORTY AND 00/100 (\$340.00) DOLLARS, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 22nd day of December, 1960, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 22nd day of December, 1960, which is dated May 1, 1963.

Defendant's address is: 274
Bay Minette, Alabama


Attorney for Plaintiff

FILED Attorney for Plaintiff guarantees the Court costs.

MAY 16 1963

CLERK

STATE OF NEW YORK
COUNTY OF NEW YORK

SS.

Julian Lazrus being duly sworn, says that he is
President of Benrus Watch Company, Inc.

That the foregoing and annexed account between said Benrus Watch
Company, Inc. and C. H. Mathews Jrly.
is correct, just and true in every particular, and is a correct
transcript from the books of original entry. That the goods,
wares and merchandise therein mentioned and described, were, on
or about the dates therein named, sold and delivered by said
BENRUS WATCH CO., INC. to said C. H. MATHEWS JRLY.
that the prices therein charged are reasonable and as agreed;
that there is now justly due and owing thereon to said Benrus
Watch Company, Inc. from said C. H. Mathews
the sum of Three hundred forty ~~00~~/xx dollars;
no part of which said sum has been paid, or in any manner settled;
that there are no deductions or offsets of any kind, and that
said holds no personal or col-
lateral security or satisfaction whatever for or on account of
said claim.

Subscribed and sworn to before me, this 1st day of May
1963 as witness my hand and official seal.

Notary Public

BERNARD SPILLMAN
NOTARY PUBLIC, State of New York
No. 30-3789800
Qualified in Nassau County
Term Expires March 30, 1968

70.5569

Received 16 day of May 1963
and on 21 day of May 1963
I served a copy of the writ in A & C
on C. H. Matthews

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Albert D. S.

O mi

SUMMONS AND COMPLAINT

BENRUS WATCH COMPANY, INC., and as
assignee of BELFORTE WATCH COMPANY,
INC., a New York Corporation,

PLAINTIFF

VS:

C. H. MATTHEWS, doing business as
MATTHEWS FURNITURE COMPANY,

DEFENDANT

FILED

MAY 16 1963

MAJIE L. DUCK

CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA