

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

August 17, 1964

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

Dear Mrs. Duck:

Re: Crescent Bed Company, Inc.
Vs: Matthews Furniture Company
Our File: 64-134

Enclosed find suit of Crescent Bed Company Vs. C. H. Matthews dba. Matthews Furniture. Request you process and oblige. Also enclosed find \$15.00 deposit for cost.

Yours very truly,



EGR/jlb
Encls.
8/27/64

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. 6154 TERM, 1964.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. H. MATTHEWS, individually, and doing business as C. H. 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, State of Alabama, at Bay Minette, against C. H. MATTHEWS, Individually, and doing business as C. H. MATTHEWS FURNITURE COMPANY, Defendant, by CRESCENT BED COMPANY, a corporation, Plaintiff.

WITNESS my hand this 19 day of Aug, 1964.

Dei. J. M. K. Clerk.

CRESCENT BED COMPANY,
a corporation,
Plaintiff,

VS

C. H. MATTHEWS, Individually, and doing business as
C. H. MATTHEWS FURNITURE COMPANY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

COMPLAINT

Count I.

The Plaintiff claims of the Defendant ONE HUNDRED THIRTY-SIX AND 12/100 (\$136.12) DOLLARS due from him by account, on, to-wit, the 28th day of July, 1964, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY -SIX AND 12/100 (\$132.12) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 28th day of July, 1964; which sum of money with the interest thereon is still unpaid.

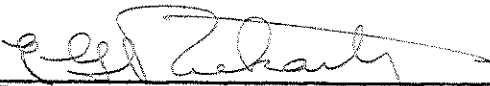
Cont'd Summons & Complaint:

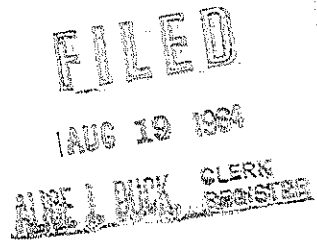
Crescent Bed vs. Matthews Furniture.

Count III.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY-SIX AND 12/100 (\$136.12) DOLLARS due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant from the 28th day of July, 1964, which sum of money with the interest thereon is still unpaid.

64-8-21-64


E. G. RICKARBY, Attorney for
Plaintiff.



STATE OF LOUISIANA,

ORLEANS PARISH ~~XXXXXX~~.

Before me, the undersigned notary public, in and for said County, in said State, personally appeared L. J. BRAQUET, who being first duly sworn, deposes and says that he is the Office Manager for CRESCENT BED COMPANY, INC., who is:

A. An individual doing business as _____

B. A partnership composed of the following partners: _____

OR:

C. A Corporation.

That as such Office Manager, affiant has knowledge of the account owed to CRESCENT BED COMPANY, INC. by C. H. MATTHEWS, individually, and doing business as C. H. MATTHEWS FURNITURE COMPANY, who is an individual, doing business as C. H. Matthews Furniture Company.

That the attached itemized statement is a true and correct statement of the account owed by C. H. MATTHEWS, individually, and doing business as C. H. MATTHEWS FURNITURE COMPANY.

That there is now owing by C. H. MATTHEWS, ind. and d/b/a C. H. MATTHEWS FURNITURE COMPANY to CRESCENT BED COMPANY, INC., the sum of ONE HUNDRED THIRTY-SIX AND 12/100 (\$136.12) DOLLARS, with interest from the 28th day of July, 1964, after allowing all credits.

L. J. Braquet
Affiant

Subscribed and sworn to before me this, the 31st day of July, 1964.

Florence Dodge
Notary Public, ORLEANS County, Louisiana
Parish

ACCOUNT NO.

1-205-937-4894

C. H. Matthews Pur.

LIMIT

ADDRESS

Bay Minette, Alabama

MADE IN U.S.A.

ITEMS	FOUR	DEBITS	DATE	ITEMS	FOUR	CREDITS	BALANCE
		17612					17612
			7/27/64			10.00	16612
			8/6/64			10.00	15612
			8/10/64			10.00	14612
			8/21/64			10.00	13612

C. - D. & B.

7/28/64

I CERTIFY THAT THIS IS A COPY OF THE ORIGINAL LEDGER SHEET FOR THE ABOVE CUSTOMER AND THAT ALL ENTRIES ARE COMPLETE.

CRESCENT BED CO., INC.

BY: L. J. BRAQUET, OFFICE MANAGER

ARTHUR L. JUNG
President

PETER JUNG, Jr.
Secretary

No 302



CRESCENT BED COMPANY

Incorporated

Steel Beds, Cribs, Springs, Studio Couches and Cots

NEW ORLEANS, LA.

(Forest)

CABLE ADDRESS:
"CRESED"
A. B. C. RA RA Imp'd

Date September 15, 61

"FOR RESTFUL SLEEP"

L & N R R

SOLD TO

C. H. Matthews Furn Co

STREET

P. O. Box 468

CITY Bay Minette, Ala.

TERMS: 2% CASH DISCOUNT FOR PAYMENT 10th OF MONTH FOLLOWING PURCHASE, OR 60 DAYS NET.

QUANTITY	CATALOG No.	COLOR	SIZE	PRICE	EXTENSION	TOTAL
----------	-------------	-------	------	-------	-----------	-------

4	860	Foldaways w/ Mattress	3/3	23.60	94.40	
---	-----	--------------------------	-----	-------	-------	--

6	#55	Coil springs	4/6	11.20	67.20	
---	-----	--------------	-----	-------	-------	--

Send to Bay Minette }
Store }

Less freight

191.60
15.48
176.12

7/28/61

I CERTIFY THAT THIS IS A COPY OF THE ORIGINAL
INVOICE COVERING THE SHIPMENT MADE TO THE
ABOVE CUSTOMER ON 9/19/61.

CRESCENT BED COMPANY, INC.

BY: L. J. Braquet
L. J. BRAQUET, OFFICE MANAGER

Shipped from Warehouse of
MIAMI MATTRESS MFG. COMPANY
Miami, Fla.

Form IN-4, 1M Sept-4-58.

770.6154

Crescent Bed Co.

vs.

C. A. Matthews

Received 19 day of Aug 1964
and on 21 day of Aug 1964
served a copy of the within Doc
to C. A. Matthews
/ service on _____

TAYLOR WILKINS, Sheriff

By W. G. Talbot D. S.

om

FILED

AUG 19 1964

ALICE I. DUCK, CLERK
REGISTER

E. H. Packard
attorney for Plaintiff

THE STATE OF ALABAMA {
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, John H. Brooks, Jr. and

John C. Post

....., of the County of Baldwin

are held and firmly bound unto Charles W. Bain

in the sum of One Thousand Seven Hundred & no/100 Dollars, to

be paid to the said Charles W. Bain

heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated the 19th day of August, 1964

The Condition of this Obligation is such:

That whereas, the above bounden Ray-Brooks Machinery Co., Inc.

a Corporation has, on the day of the date

hereof, prayed an Attachment at the suit of Ray-Brooks Machinery Co., Inc.

a Corporation against the estate of above named

for the sum of Eight Hundred Fifty & no/100 Dollars,
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said Ray-Brooks Machinery Co., Inc., a Corporation

should prosecute said Attachment to effect, and pay the said Defendant all such damages as
may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be
void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now,
or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

This Is To Certify That This Is A
Good And Sufficient Bond. If Pre-
sented To Me I Would Approve Same.

THIS THE 19 DAY OF Aug 1964

M.S. Butler Sheriff
Montgomery Co. Ala.
By Richard Goodwyn
Chief Deputy

RAY-BROOKS MACHINERY COMPANY, INC.

By:

David H. H. H.
Secretary

Surety

John H. Brooks, Jr.
John H. Brooks, Jr.

Surety

John C. Post
John C. Post

Approved, this _____ day of _____, 19 ____

_____, Clerk

AUG 18 1964

THE STATE OF ALABAMA {
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, Frances B. Dean, Notary Public

in and for said County, personally appeared David W. Pettis

who, being duly sworn, on oath saith that

Charles W. Bain justly indebted to
Ray-Brooks Machinery Co., Inc.

in the sum of Eight Hundred Fifty & no/100 Dollars,

which said amount is justly due after allowing all just offsets and discounts, and that the said

Charles W. Bain has moneys, property, or effects, liable to satisfy

his debts, which he fraudulently withholds

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

David W. Pettis
Secretary

Subscribed and sworn to before me this 19th day of August, 19 64

Frances B. Dean

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

At Bay Minette, Ala.

TO

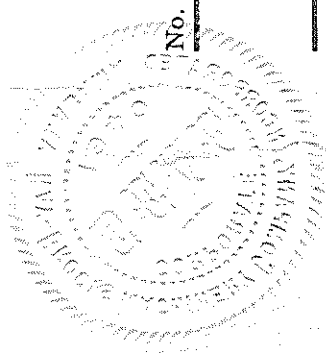
ATTACHMENT BOND AND AFFIDAVIT

Filed this the day

of, 19

Clerk

Attorney



INSTRUCTIONS.

SENDER: WRITE (OR TYPE) MESSAGE, PULL OUT YELLOW SHEET, MAIL THE OTHER TWO.
RECIPIENT: WRITE YOUR REPLY AT BOTTOM, MAIL BACK WHITE SHEET AND KEEP THE PINK.

**JOHN V. DUCK
& RICHARD C. LACEY**
Attorneys At Law
319 Magnolia Avenue
FAIRHOPE, ALABAMA

*Message
Reply*

DATE:

August 20, 1964

FILE NO:

PRIORITY

- ☐ URGENT!
☐ SOON AS POSSIBLE
☐ NO REPLY NEEDED

ATTENTION:

SUBJECT:

RAY-BROOKS MACHINERY COMPANY, INC.
VS.
CHARLES W. BAIN

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

Dear Mrs. Duck:

Enclosed you will find Bill of Complaint, Bond and Affidavit, and Writ of Attachment styled as above.

Please have this served as soon as possible and ask the Sheriff to notify me where the bull-dozer is after he attaches it.

Sincerely yours,

SIGNED:

John V. Duck
John V. Duck W

DATE OF REPLY:

REPLY TO:

SIGNED:

SENDER: MAIL RECIPIENT WHITE AND PINK SHEETS

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

FROM

TO

MESSAGE

REPLY