

Received 22 day of Aug 1968
and on 23 day of Aug 1968
served a copy of the writ J & C
on Martin Radio & TV

By service on Mr. Martin

TAYLOR, WILLIAMS, Sheriff
By W. A. Zellerbach, Jr.
o

SUMMONS AND COMPLAINT

AMERICAN OF MARTINSVILLE,

PLAINTIFF,

VS:

MARTIN RADIO & T.V.,

DEFENDANT.

FILED

AUG 23 1968

ALICE J. DUCK CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA 36535

If an individual, omit paragraphs 2 and 3; if a corporation, omit paragraphs 1 and 2.

STATE OF VIRGINIA
CITY
~~COUNTY~~ OF MARTINSVILLE

BEFORE ME, the undersigned authority, on this day personally appeared J. F. Hankins
who, being by me duly sworn, states on oath that.....he is
(Name of person making affidavit)

1. An individual trading as.....
(Trade style if used — otherwise owner's name)

2. Agent of.....
(Name of firm)

a co-partnership, composed of.....
(Names of partners)

and that.....he is duly qualified and authorized to make this affidavit.

3. Agent of American Furniture Company, Incorporated, a corporation,
(Name of corporation)

duly incorporated and existing under and by virtue of the laws of the State of Virginia,

with its principal office and domicile in the City of Martinsville, County

of Henry, and State of Virginia, and

is duly qualified and authorized to make this affidavit.

4. That the foregoing and annexed account, claim, and cause of action in favor of American Furniture
Company, Incorporated and against Martin Radio and TV
700 Second Street, Bay Manette, Alabama 36507

(\$176.50)

in the sum of One hundred seventy-six and .50/100 Dollars
is within the knowledge of affiant just and true, and that it is due and that all just and lawful offsets, payments and
credits have been allowed.

AMERICAN FURNITURE COMPANY, INCORPORATED

J. F. Hankins
Secretary & Treasurer

SWORN TO AND SUBSCRIBED BEFORE ME, this 29th day of July A. D. 1968

(Notary Seal)

Edith B. Martin
NOTARY PUBLIC IN AND FOR ~~COUNTY~~ OF
MARTINSVILLE STATE OF VIRGINIA
My Commission Expires March 13, 1971.

SUMMONS

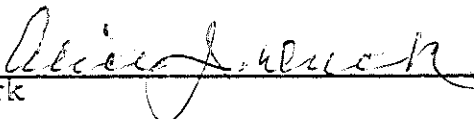
STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons MARTIN RADIO & T.V., 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 AMERICAN OF MARTINSVILLE.

Witness my hand this the 22 day of August, 1968.


Clerk

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COMPLAINT

AMERICAN OF MARTINSVILLE,	X	
	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	
	X	AT LAW
MARTIN RADIO & T. V.,	X	720.8276
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 50/100 DOLLARS (\$176.50), due from him by account on, to wit: the 6th day of January, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 50/100 DOLLARS (\$176.50), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 6th day of January, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-SIX & 50/100 DOLLARS (\$176.50), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 6th day of January, 1967, 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 29th day of July, 1968.


Attorney for Plaintiff

Defendant's address:
700 Second Street
Bay Minette, Alabama 36507

FILED

AUG 22 1968

ALICE J. DUCK CLERK
REGISTER

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 120

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

September 21, 1968

Hon. Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: American of Martinsville
Vs: Martin Radio & TV
Case No. #8276

Dear Judge Mashburn:

Kindly render a judgment in this case based
on a sworn to itemized statement of account on
which there is a balance due of \$176.50, plus
\$14.50 interest, for a total of \$191.00.

Cordially yours,



FOREST A. CHRISTIAN

AMERICAN FURNITURE COMPANY, INC.
Martinsville, Va. 24112

MARTIN RADIO TV CO
700 2nd Street
BAY MANETTE, ALABAMA 36507

DATE
06/25/68

ACCOUNT NO.
57679

DATE
06/25/68

ALL ITEMS SHOWN IN THIS COLUMN
ARE PAST DUE AND MUST BE PAID
IMMEDIATELY

CODE CODE
NO. DESCRIPTION

01-REGULAR SHIPMENTS
02-ALL CREDIT MEMOS
03-REPAIR & RETURN ITEMS
04-REPLACEMENT SHIPMENT
05-COLLECTION AGENCY
06-SAMPLES
07-FURNITURE PENDING TRANSFER
08-DEDUCTION-CREDIT TO BE ISSUED
09-UNEARNED DISCOUNT
10-DISALLOWED DEDUCTION
11-UNEXPLAINED DEDUCTION
12-C.O.D. DEPOSIT
13-C.I.A. CHECK
14-UNRECONCILED
CASH PAYMENT

INVOICE NUMBER	INVOICE DATE			OUTSTANDING BALANCES		C O D E	INVOICE NUMBER	PAST DUE BALANCE	
	MO.	DAY	YR.						
19904	11	30	66	161	50	05	19904	161	50
26666	01	06	67	15	00	05	26666	15	00
							<div>PAST DUE</div>		
				TOTAL OUTSTANDING BALANCES		RETURN THIS STUB WITH PAYMENT	TOTAL PAST DUE		
				176 50			176 50		

PLEASE NOTIFY US IF YOUR RECORDS
ARE IN DISAGREEMENT WITH
ANY OF THE ITEMS SHOWN ON THIS STATEMENT.

PAST DUE