

609

MOORE-HANDLEY HARDWARE CO.,
a corporation,
Plaintiff,

vs.

WILLIAM MARVIN HALL, an in-
dividual doing business under
the name of BALDWIN IMPLEMENT
COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Now comes the defendant, and for answer to the plain-
tiff's complaint, and to each count thereof, separately and sever-
ally, says:

1. That the facts therein alleged are untrue.

Barber & Lacey
G. H. Lacey

Attorneys for Defendant.

Defendant demands a trial by
Jury:

Barber & Lacey
G. H. Lacey
Attorneys for Defendant.

RECORDED

MOORE-HANDLEY HARDWARE CO.,
a corporation,
Plaintiff,
vs.

WILLIAM MARVIN HALL, an in-
dividual doing business under
the name of BALDWIN IMPLEMENT
COMPANY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

ANSWER.

Filed Oct 3, 1940

R. S. Duck
Clerk.

STATE OF ALABAMA :
BALDWIN COUNTY : TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon William Marvin Hall, an individual doing business under the name of Baldwin Implement Company, to appear, within thirty days from the service of this writ, in the circuit court, to be held for said county at the place of holding the same, then and there to answer the complaint of Moore-Handley Hardware Co., a corporation.

Witness my hand, this the 6th day of September, 1940.

R. S. Duck
Clerk of the Circuit Court

MOORE-HANDLEY HARDWARE CO., a
corporation,

Plaintiff,

-Vs-

WILLIAM MARVIN HALL, an in-
dividual doing business under
the name of BALDWIN IMPLEMENT
COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

1. Plaintiff claims of the defendant the sum of \$109.56, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant, to-wit, during the months of December, 1939 and March, 1940, which sum of money, with interest thereon, is still unpaid.

2. Plaintiff claims of the defendant the sum of \$109.56, due from him by account stated between plaintiff and defendant on, to-wit, March 8, 1940, which sum of money, together with interest thereon, is still due and unpaid.

3. Plaintiff claims of the defendant the sum of \$109.56, due from him by account on, to-wit, March 8, 1940, which sum of money, together with interest thereon, is still unpaid.

The account sued on is evidenced by itemized, verified statement filed with this complaint.

Sidney A. Gray
Attorney for Plaintiff

Defendant's address:
Robertsdale, Alabama.

W. W. FRENCH,
President

C. C. BLACKWELL,
Vice-President

J. G. HOLLAND
Secy.-Treas.

INVOICE

MOORE-HANDLEY HARDWARE CO.

BIRMINGHAM, ALA.

August 29, 1940

Mention Above Date in Correspondence



Baldwin Implement Co
Robertsdale, Ala

The goods covered by this invoice to the best of our knowledge and belief, were produced in compliance with the provisions of the U. S. Fair Labor Standards Act of 1938.

ORDER No. Page #2

OUR No.

TERMS

SALESMAN

F. O. B.

V I A

SHIPPED TO

March 8, 1940. Cont.

1/6	Doz H 26 6Plier	2 20 Doz	37
1/12	Doz L S 14 SC Driver	1 35 Doz	11
1/12	Doz L S 16 Same	2 10 Doz	18
1	Only 104 Reed Machinist Vice	12 75 Ea 10%	11 48
1	Doz 210 BX 10 Atkins Hack		
	Saw Blade	60 DZ	60 16.64

Total Debits.....\$109.56

GENERAL OFFICES
UNITED MERCANTILE AGENCIES
INCORPORATED
ADJUSTMENTS and COLLECTIONS
LOUISVILLE, KY.

County of JEFFERSON

State of ALABAMA

SS.

Before me, Minnie Daniel

and sworn in and for the above state and county, this day personally appeared J. G. Holland a Notary Public duly commissioned to me well known, who being by me first duly sworn says that;

- *1. He is an individual trading as
*2. That he and are partners trading as
*3. That he is treasurer of Moore-Handley Hardware Company of Birmingham a corporation incorporated under the laws of the State of Alabama and that the foregoing account in favor of Moore-Handley Hardware Company and against Baldwin Implement Company showing a balance and amount due of One Hundred Nine and 56/100 with interest from the day of 19..... until paid, is within his knowledge just true and correct; that it is justly and truly due and unpaid; that all just and lawful offsets, credits, discounts and payments have been allowed and the said amount is due after said allowance and exclusive of all set-offs and just grounds of defense; that the goods in said accounts were sold and delivered as therein charged and on said last named day said amount became due and payment thereof was demanded and no part of same has been paid.

Sworn to and subscribed before me this 30th

day of August

1940

My commission expires 4/1/42

Notary Public.

*Use paragraph covering.

INVOICE

MOORE-HANDLEY HARDWARE CO.

BIRMINGHAM, ALA. August 29, 1940
Mention Above Date in Correspondence



Baldwin Implement Company,
Robertsdale, Ala

The goods covered by this invoice to the best of our knowledge and belief, were produced in compliance with the provisions of the U. S. Fair Labor Standards Act of 1938.

ORDER No.	OUR No.	TERMS	SALESMAN	F. O. B.	V I A	SHIPPED TO
Dec. 7, 1939.						
120	Only 6 1/2' Ideal Fence Posts	40 08 C				48 10
1	Keg 1 1/4 Galv Staples	3 95 Keg				3 95
4	Coils 4 Ft Wauk Cattle Barb Wire	2 91 Ea				11 64
						63.69
Dec. 14, 1939.						
1	Only PM 64 A Coffee Maker	5 57 Ea				5 57
1	Only Model D H B Food Mixer With Juicer (Mod E)	15 44 Ea				15 44
1	Only 210 R Floor Lamp	4 50 Ea				4 50
1	Only 100-200-300 W 115 V G 30 Lamp	60 Ea				60
2	Only 5/16 Climax WR Clips	4 00 C				08
1	Only 5/16 Slip Hook	12 50 C			13	08
40	Ft 3/8" 6 x 19 Plow Steel Wire Rope	13 Ft 5 20			40%	08
					30-10-5-5%	2 96
						29.23
March 8, 1940.						
2	Only 99 1/8 Blacksmith Drill	45 Ea				90
1	Only 99 3/16 Same	50 Ea				50
1	Only 99 1/4 Same	60 "				60
1	Only 99 1/16 "	70 "				70
1	Only 99 1/2 Same	1 00 "				1 00
1	Only 99 7/16 Same	90 Ea				90
1	Only 99 9/16 Same	1 10 "				1 10
1	Only 99 3/8 Same	80 Ea				80
					40%	6 50 3 90

607
RECORDED

Summons & Complaint

Rebated

Moore-Handley Hardware Co,
a corporation

vs

William Marvin Hall an in-
dividual doing business
under the name of
Baldwin Implement Co.

Filed September 5 1940
R. S. Duck, Clerk

Received in Sheriff's Office

this 6 day of Sept, 1940

W. R. STUART, Sheriff

Executed this 7th
day of Sept 1940 by
serving a copy of
the within summons &
complaint on

William Marvin Hall, an
individual doing business
under the name of
Baldwin Implement Co.

W. R. Stuart
Sheriff

by
A. P. Pruitt
DS