

GROBLER SOCIETY, INC., A
CORPORATION

PLAINTIFF

VS.

PHIL BRADY

DEFENDANT

VS.

PHIL BRADY

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

MOTION

Comes the Plaintiff by his attorney and moves the court to render a judgment by default in the amount of SEVENTY & 00/100 DOLLARS (\$70.00), plus interest from the 25th day of February, 1947, which was verified by an affidavit of a competent witness for the Plaintiff.

Forest A. Christian
Attorney at Law

1039

GROLIER SOCIETY, INC., a
corporation

Plaintiff

vs.

PHIL BRADY,

Defendant

MOTION

Filed

4-10-47

Alice J. Much
clerk

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PHIL BRADY 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 same, then and there to answer the complaint of the GROLIER SOCIETY, INC., a corporation.

Witness my hand this the 3 day of March, 1947.

Alice J. Wrench
Clerk of the Circuit Court

GROLIER SOCIETY, INC., a)
CORPORATION,)
Plaintiff)
VS)
PHIL BRADY,)
Defendant)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

COMPLAINT

The Plaintiff, a corporation organized and existing under the laws of the State of Pennsylvania, claims of the Defendant SEVENTY & 00/100 DOLLARS (\$70.00), due from him by account on the 25th day of February, 1947, for merchandise, goods and chattels sold by the Plaintiff to the Defendant on November 30, 1945, which sum of money with interest thereon is still unpaid.

Forest A. Christian
Forest A. Christian, Foley, Alabama
Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of the amount of this claim, verified by the affidavit of a competent witness. Made before and certified to by a Notary Public which shows the amount owed on this claim as of February 25, 1947.

Forest A. Christian

COMPLAINING

GROBLER SOCIETY, INC., A
CORPORATION,

VS

PHIL BRADY,

Defendant.

Plaintiff

Plaintiff

Plaintiff

Plaintiff

Plaintiff

Handwritten signature

DO THE COURT OF THE STATE OF NEW YORK

IN SENATE

AND JUDICIAL DEPARTMENT

THE GROLIER SOCIETY, INC.
Publishers

TELEPHONE
RITTENHOUSE 6-6060

1207 CHESTNUT STREET
PHILADELPHIA 7, PA.

THE STATE OF PENNSYLVANIA,)
)
PHILADELPHIA COUNTY.)

Before me, the undersigned authority, personally appeared A. S. Garber, known to me, who being duly sworn upon her oath, states that she is the Cashier for the Grolier Society, Inc., of Philadelphia, Pa., and that as such, she makes this affidavit:

That on November 30, 1945, Phil Brady, Post Office Box 114, Fairhope, Alabama, order THE BOOK OF KNOWLEDGE, 10 volumes and Funk and Wagnall's Dictionary, 2 volumes, for which the price was \$79.50; that we delivered the said books to Phil Brady at the address given above and that he agreed to pay \$79.50 for books. On November 30, 1945, Phil Brady paid \$9.50 as down payment and there remains due and unpaid on such account, after allowing all due credits, a balance of \$70.00.

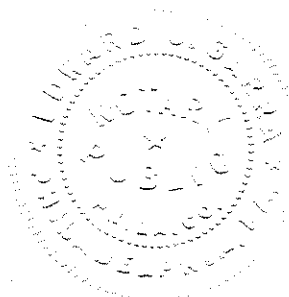
I am personally acquainted with these facts because I am the Cashier and in a position to know that this man owes the money.

A. S. Garber
A. S. Garber
Cashier

Sworn and subscribed before me this twenty-fifth day of February, 1947.

Edward Kane
Notary Public

NOTARY PUBLIC
My Commission Expires January 7, 1951.



1039

COMPLAINT

Received in Office

3-3-47

Taylor Wilkins

Sheriff

Executed 3-8-1947
by serving copy of within Summons and
Complaint on

Phil Brady

GROLMER SOCIETY, INC., A
CORPORATION,

Plaintiff

VS

PHIL BRADY,

Defendant

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

ALICE H. DUCK, Clerk

MAR 3 1947

Alice H. Duck

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

4-2-6-0

THE GROlier SOCIETY, INC.

Publishers

Telephone
Rittenhouse 6-6060

1207 Chestnut Street
Philadelphia 7, Pa.

THE STATE OF PENNSYLVANIA,
PHILADELPHIA COUNTY.

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(signed) E. S. Garber

A. S. Garber
Cashier

Sworn and subscribed before me this twenty-fifth day of February, 1947.

(signed) Edward J. Garra

Notary Public

ALICE J. DUCK, Clerk

MAR 8 - 1947

FILED

Defendant

PHIL BRADY,

VS

Plaintiff

GROVER SOCIETY, INC., A
CORPORATION,

affidavit

~~CONFIDENTIAL~~

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