

1268

UNITED STATES STOVE COMPANY, a  
Corporation,

Plaintiff

- vs -

WALTER WADE, Individually and  
Doing Business as WADE APPLIANCE  
COMPANY,

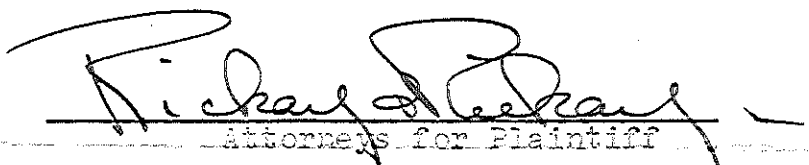
Defendant

L A W

CIRCUIT COURT OF  
BALDWIN COUNTY,  
ALABAMA

The plaintiff request judgment by default in the sum of, THREE HUNDRED FIFTY TWO and 92/100 DOLLARS, (\$352.92), for that service was had on the defendant on the 16th day of November and the defendant has failed to plead, answer or demur to the complainant as required by law. Wherefore plaintiff request the Clerk to note this demand on the docket and send the papers in the cause, which includes an Itemized and Verified statement of account, to the Judge in accordance with the rule and practice of this court, so that a judgment by default in this cause can be entered.

Account.....	\$349.43
Interest 6%.....	3.49
Total	\$352.92

  
Attorneys for Plaintiff

RECORDED

UNITED STATES STOVE COMPANY, a  
Corporation,  
Plaintiff

- VS -

WALTER WADE, Individually and  
Doing Business as WADE APPLIANCE  
COMPANY,  
Defendant

MOTION FOR JUDGMENT BY DEFAULT

FILED

DEC 20 1948

ALICE J. DUNN, Clerk

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

November 13, 1948

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

Dear Mrs. Duck:

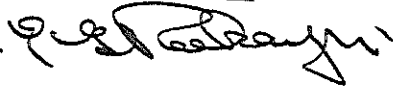
With this we are handing you Summons and  
Complaint in the case of U.S. Stove Company -vs-  
Wade Appliance Company.

We are also enclosing deposit for cost  
in the sum of \$15.00 and Itemized and Verified  
statement of account. Please notify us as soon as  
service is had on Defendant.

Yours very truly,

RICKARBY & RICKARBY

by:-



EGR,jr:rs  
492  
encls.

1268

United States Stove Co.  
a corporation

vs.

Walter Wade  
Individually  
and d/b/a Wade Appliances Co

Filed 11-15-48

Rickards

COUNTY OF Marion

(188)—13743

STATE OF Tennessee

Be it remembered, that on this 30th day of October  
A. D. 1948, personally appeared before me, the undersigned authority,  
S. L. Rogers, President known to me  
who being duly sworn, upon his oath stated that he is President  
of United States Stove Company  
{ a corporation organized and doing business under the laws of the State of Tennessee  
and has been duly authorized by said corporation to make this affidavit  
a partnership composed of  
a sole trader doing business as  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Corporation; that the attached account against  
Wade Appliance Company of Loxley, Alabama  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Wade Appliance Company  
at { its } special instance and request, that credit has been duly given for all payments and  
{ their }  
{ his }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of Three hundred forty nine & 43 cents Dollars  
(\$ 349.43) with interest from 19 is justly due and  
remains unpaid.

S L Rogers, President

X

I hereby certify under my official seal that I am authorized as a Notary Public to  
administer oaths under the laws of the State of Tennessee  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

[Signature]  
Notary Public

County of Marion State of Tenn.  
My commission expires July 1 1951 A. D. 1948



SUMMONS AND COMPLAINT

THE STATE OF ALABAMA }  
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

No.-----

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon WALTER WADE, Individually and Doing  
Business as WADE APPLIANCE 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 WALTER WADE, Individually,  
and D/B/A, WADE APPLIANCE COMPANY, Defendant-----

by U. S. STOVE COMPANY, a Corporation

----- Plaintiff-----

Witness my hand this 15<sup>th</sup> day of Nov 1948

Reice J. Duck, Clerk

RECORDED

No. 1268

Page

THE STATE of ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

UNITED STATES STOVE COMPANY,

a Corporation,

Plaintiffs

vs.

WALTER WADE, Individually and

D/B/A WADE APPLIANCE COMPANY,

Defendants

SUMMONS and COMPLAINT

Filed 11-15-1948

Clerk

RICKARBY & RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minette, Ala.

Defendant lives at

Loxley, Alabama

RECEIVED IN OFFICE

11-15

1948

Jayla Wilkins

Sheriff

I have executed this summons

this

Nov 16th

1948

by leaving a copy with

Walter Wade

Jayla Wilkins

Sheriff

Deputy Sheriff



UNITED STATES STOVE COMPANY, a  
Corporation,  
Plaintiff

L A W  
CIRCUIT COURT OF  
BALDWIN COUNTY,  
ALABAMA

- vs -

WALTER WADE, Individually and  
Doing Business as WADE APPLIANCE  
COMPANY,  
Defendant

COUNT 1.

The Plaintiff claims of the Defendant THREE HUNDRED FORTY-NINE and 43/100 DOLLARS, (\$349.43) due from him by account on to-wit, the 23rd day of April, 1948, all of which sums of money with interest thereon from the 23rd day of April, 1948, is still due and unpaid.

COUNT 2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED FORTY-NINE and 43/100 DOLLARS, (\$349.43), for goods, wares and merchandise sold by Plaintiff to Defendant on to-wit, the 23rd day of April, 1948, all of which sums of money with interest thereon is still due and unpaid.

  
Plaintiff's Attorneys.

The account shown on which this action is based is evidenced by an itemized and verified statement filed herewith.

  
Plaintiff's Attorneys.

1268

W. A. W.      s. YAKUBOVICH & SONS, INC.  
CITIZEN COURT OF      Plaintiff

YAKUBOVICH & SONS, INC.

ALABAMA

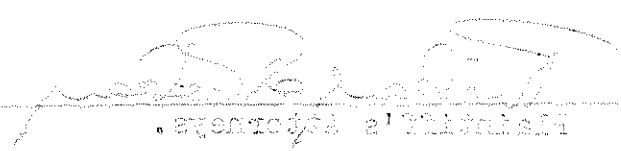
Plaintiff, Individually and  
Jointly with YAKUBOVICH & SONS, INC.  
Defendant

COURT 1.

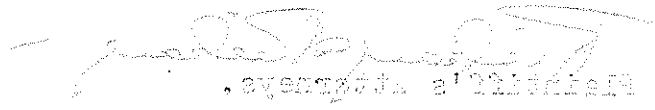
The Plaintiff claims of the Defendant THREE HUNDRED  
THIRTY-THREE and 43/100 DOLLARS, (\$333.43) due from him by account  
on to-wit, the 23rd day of April, 1943, all of which sums of money  
with interest thereon from the 23rd day of April, 1943, is still  
due and unpaid.

COURT 2.

The Plaintiff claims of the Defendant the sum of THREE  
HUNDRED THIRTY-THREE and 43/100 DOLLARS, (\$333.43), for goods, wares  
and merchandise sold by Plaintiff to Defendant on to-wit, the 23rd  
day of April, 1943, all of which sums of money with interest thereon  
is still due and unpaid.

  
Plaintiff's Attorney

The account shown on which this action is based is ev-  
idenced by an itemized and verified statement filed herewith.

  
Plaintiff's Attorney

ELLIOTT G. RICKARBY

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

December 17, 1948

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

Dear Mrs. Duck:- IN RE U.S. STOVE COMPANY vs.  
WADE APPLIANCE COMPANY

Enclosed find motion for judgment by  
default. Please process and present to the Judge.

Yours very truly,

RICKARBY & RICKARBY

by:- 

EGR,jr:rs  
492  
encl.

CC: Dun & Bradstreet, Inc.  
Nashville, Tennessee