

SHIRLEY CLOAK AND DRESS COMPANY,
a corporation,

Plaintiff,

-vs.-

EDWARD ENGEL, individually and
doing business as ENGEL'S DEPART-
MENT STORE,

Defendant.


§ IN THE CIRCUIT COURT OF
§ BALDWIN COUNTY, ALABAMA.

§ AT LAW

§ CASE NO. 1627

MOTION FOR JUDGMENT BY DEFAULT.

Comes now the plaintiff in the above entitled cause and shows unto Your Honor that suit was filed in this Honorable Court on the 15th day of March, 1951, that personal service was perfected upon the defendant, Edward Engel, on the 28th day of March, 1951, and that more than thirty days have elapsed since the date of said personal service, that the defendant has failed to plead, answer or demur or file an appearance in said cause, wherefore the plaintiff moves this Honorable Court to enter a judgment by default against the defendant and in favor of the plaintiff on an itemized verified statement of the account sued upon in the sum of One Hundred Ten and 99/100 (\$110.99), with interest thereon from the 23rd day of March, 1950, together with court costs incurred in this action.


Attorney for Plaintiff

SHIRLEY CLOAK AND DRESS COMPANY,
a corporation,

Plaintiff,

-vs.-


EDWARD ENGEL, individually and
doing business as ENGER'S DEPART-
MENT STORE,

Defendant.

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Attorney for Plaintiff

SHIRLEY CLOAK AND DRESS COMPANY, }

a corporation }

Plaintiff. }

VS. }

EDWARD ENGEL, individually and }
doing business as ENGEL'S DEPART- }
MENT STORE }

Defendant. }

IN THE CIRCUIT COURT

OF

BALDWIN
~~MOBILE~~ COUNTY, ALABAMA.

AT LAW.

NO. 1627.

NON-MILITARY AFFIDAVIT.

STATE OF ALABAMA }


COUNTY OF MOBILE }

NOW comes, Allan R. Cameron,

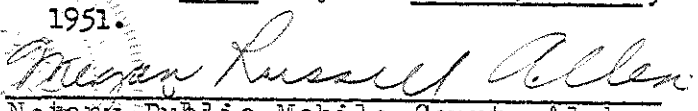
who being first duly sworn, deposes and says that the defend-
ant herein, Edward Engel,

was not at the time of the filing of this suit, and is not now,
in the Military or Naval Service of the United States.

The Defendant resides at Elberta, Baldwin County, Alabama.


Allan R. Cameron.

Sworn to and subscribed before me;
this the 30th day of May,
1951.


Notary Public, Mobile County, Alabama.

Filed _____,

CLERK.

RECORDED



110.99
7
776.93

FILED
MAY 31 1951
ALICE J. DUCK, Clerk

SHIRLEY CLOAK AND DRESS COMPANY,
a corporation,

Plaintiff,

-vs.-

EDWARD ENGEL, individually and
doing business as ENGEL'S DEPART-
MENT STORE,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


CASE NO. _____

COUNT ONE

The plaintiff claims of the defendant ONE HUNDRED TEN AND 99/100 (\$110.99) DOLLARS, due from him by account on the 23rd day of March, 1950, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant ONE HUNDRED TEN AND 99/100 (\$110.99) DOLLARS, due from him on account stated between the plaintiff and the defendant on the 23rd day of March, 1950, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff.

An itemized, verified statement of the account sued on in Count One of the foregoing complaint is attached hereto and filed herewith.


Attorney for Plaintiff

Address of Defendant:

c/o Engel's Department Store
Elberta, Baldwin County
Alabama.

STATE OF Georgia

COUNTY OF Fulton

Before me, the undersigned authority in and for aforesaid county and state,
who as a notary public under my seal of office, which seal of office is hereto attached, person-
ally appeared Sylvan Makover known to me,
who being duly sworn, upon his oath stated he is Secretary & Treasurer

_____ of Shirley Cloak & Dress Company a corporation organized and doing business under the laws of Georgia

_____ ; a partnership composed of _____

_____ ; a sole trader doing business as _____

_____ ; that as such he makes this affidavit; that he is familiar with the books and business of Shirley Cloak & Dress Company; that the attached account against

Engel Brothers is just and correct within the knowledge of

this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said Engel Brothers at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance

thereof amounting to the sum of One Hundred Ten Dollars (\$ 110.90) with interest from March 23, 19 50 is justly due and remains unpaid.

Sworn to, subscribed, acknowledged, signed and sealed before me, as a notary public under my seal
of office, with my seal hereto affixed on this the 1st day of March, 1951

Michael Curlew Hancock
- A Notary Public in and for the

A Notary Public in and for the

State of Georgia

County of Fulton

SHIRLEY CLOAK & DRESS CO.



PHONE: ALPINE 0681 P. O. Box 4544 209-11-13 PRYOR ST., S. W.
ATLANTA 2, GEORGIA / /

2/23/51

Engle Bros.,

Elberta Ala.

1950

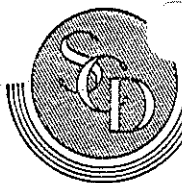
DATE	REFERENCE	DEBIT	CREDIT	BALANCE
		BALANCE FORWARD		
Mar 23	mde	116.74		
	Less			
4/24	Returns	5.75		
			\$ 110 -	99 -

PAY LAST AMOUNT IN THIS COLUMN

Discounts Not Allowed on NET INVOICES and PAST DUE BALANCES
EXPLANATION OF SYMBOLS: 8%=Terms: 8/10 E.O.M. NT=Terms: Net 10 E.O.M.

"HERE'S YOUR INVOICE"

THOMAS MAKOVER
SYLVAN A. MAKOVER
STANFORD I. MAKOVER



Manufacturers and Distributors
LADIES' AND CHILDREN'S READY TO WEAR

PHONE MA. 5882 - 209-11-13 PRYOR STREET - P.O. BOX 4544
ATLANTA 2, GEORGIA

MAILING ADDRESS
P. O. BOX 4544
ATLANTA 2, GA.

ALL CLAIMS MUST BE MADE
WITHIN FIVE DAYS AFTER
RECEIPT OF GOODS

SOLD TO

STREET

CITY

TERMS

VIA

YOUR ORDER NO.

DEPT. NO.

SALESMAN

8/10/68

CP

3/16/50

mail

[illegible]

THANK YOU

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1627

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Edward Engel, individually and d/b/a

ENGELS DEPARTMENT STORE

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 Edward Engel,
individually and d/b/a ENGELS DEPARTMENT STORE, Defendant

by SHIRLEY CLOAK AND DRESS COMPANY, A CORPORATION

Plaintiff.....

Witness my hand this 15th day of March 19..51....

W. J. Ruck, Clerk

No. 1627

Page

RECORDED

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

SHIRLEY CLOAK AND DRESS COMPANY

Plaintiffs

vs.

EDWARD ENGEL, individually and

d/b/a ENGELS DEPARTMENT STORE

Defendants

SUMMONS and COMPLAINT

Filed 3-15-51, 19.....

W. C. Smith, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

March 15, 1951

Taylor Wilkins, Sheriff
I have executed this summons

this 3-28, 1951

by leaving a copy with

Edward Engel

Taylor Wilkins Sheriff
Edgerly Steadham Deputy Sheriff

ALLAN R. CAMERON

ATTORNEY AT LAW

FIRST NATIONAL BANK ANNEX

P. O. BOX 115

MOBILE 1, ALABAMA

March 14, 1951.

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

Re: Shirley Cloak and Dress Co.
v. Edward Engel d/b/a Engel's
Department Store.

Dear Mrs. Duck:

I am enclosing a complaint in the above styled suit, which I shall appreciate your accepting for filing, and advising me when the Sheriff's Department has perfected personal service upon the defendant.

Thanking you for this favor, I am

Yours very truly



Allan R. Cameron.

arc/mra

Enclosure.

1627

Shirley Cloak^r
dress CO. inc.

vs.

Edward Engel, ind.
and d/b/a Engels Rept Store

on account

Filed 3-15-57

Allen R. Cameron