

WASHINGTON MANUFACTURING COMPANY,
doing business as OLD KENTUCKY
MANUFACTURING COMPANY, a corporation,

Plaintiff,

-vs.-

EDWARD ENGEL, individually and
doing business as ENGEL'S DEPARTMENT
STORE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 1629

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 16th 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 One and 11/100 (\$101.11) Dollars, with interest thereon from the 1st day of September, 1950, together with court costs incurred in this action.


Attorney for Plaintiff

WASHINGTON MANUFACTURING COMPANY,
doing business as OLD KENTUCKY
MANUFACTURING COMPANY, a corporation,

Plaintiff,

-vs.-

EDWARD ENGEL, individually and
doing business as ENGEL'S DEPARTMENT
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Attorney for Plaintiff

WASHINGTON MANUFACTURING COMPANY,
doing business as OLD KENTUCKY
MANUFACTURING 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. 1629

NON-MILITARY AFFIDAVIT.

STATE OF ALABAMA


COUNTY OF MOBILE

NOW comes, Allan R. Cameron,
who being first duly sworn, deposes and says that the defen-
dant 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

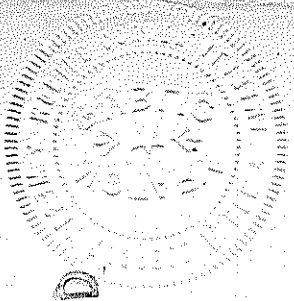
Sworn to and subscribed before me;
this the 30th day of May,
1951.


Notary Public, Mobile County, Alabama.

Filed _____,

CLERK.

101.11
45%
30535
40444
454995



RECORDED

FILED

MAY 31 1951

WILLIAM L. BUCK, CLERK

WASHINGTON MANUFACTURING COMPANY,
doing business as OLD KENTUCKY
MANUFACTURING COMPANY, a corpora-
tion,

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

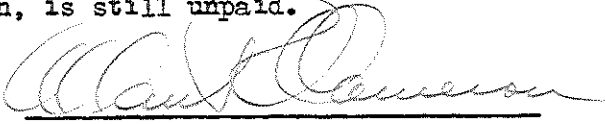
CASE NO. 1629

COUNT ONE


The plaintiff claims of the defendant ONE HUNDRED ONE AND
11/100 (\$101.11) DOLLARS, due from him by account on the 1st day of
September, 1950, which sum of money, with interest thereon, is still
unpaid.

COUNT TWO

The plaintiff claims of the defendant ONE HUNDRED ONE AND
11/100 (\$101.11) DOLLARS, due from him on account stated between the
plaintiff and the defendant on the 1st day of September, 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, Alabama
(Baldwin County)

STATE OF Tennessee

COUNTY OF Davidson

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, personally appeared _____ known to me, who being duly sworn, upon his oath stated he is _____

_____ of Washington Mfg. Co. d/b/a Old Kentucky Mfg. Co. a corporation organized and doing business under the laws of _____

_____; 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 Washington Mfg. Co. d/b/a Old Kentucky Mfg. Co.; that the attached account against Engel's Dept. Store 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's Dept. Store 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 One Dollars (\$ \$101.11 with interest from September 1, 1950 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 28 day of Feb, 1951

Butch L. Jones
A Notary Public in and for the

State of Tennessee

County of Davidson

"OLD KENTUCKY" BRAND

TRADE MARK REGISTERED

Work Shirts, Work Pants, Dress Shirts, Overalls
Children's Play Suits

LOUISVILLE, KY.

Engel's Dept. Store

Alberta, Ala.

		Mdse. Net 30 days				
		Aug 29, 1950 as 9/1/50	101	11		

OUR ACCOUNTS ARE INSURED BY THE AMERICAN CREDIT INDEMNITY CO., OF NEW YORK

OLD KENTUCKY MANUFACTURING COMPANY

Manufacturers of

WORK CLOTHING AND SPORTSWEAR FOR MEN AND BOYS

605 WEST MAIN ST. • LOUISVILLE, KY.

INVOICE

SOLD TO

• ENGLES DEPT STORE
• ELBERTA, ALA.
•

SHIP TO

•
•
•
•
•

DATE		
MO.	DAY	YR.
* 8	29	50

NOTE:

"SHIPPED TO" SAME
AS "SOLD TO"

UNLESS
OTHERWISE
INDICATED

AS OF SEPT 1, 1950

TERMS: NET 30 DAYS—NO DISCOUNT

INVOICE NO.	CUSTOMER'S NO.	BATCH	S'MAN	TYPE	METHOD OF SHIPMENT			AMOUNT	
34186		25		2	P P INSURED			2	11
ITEM DESCRIPTION					LOT NUMBER	DOZ.	12THS	PRICE	
Shirts					22 18	1		19 50	19 50
Shirts					22 18B	1		16 50	16 50
Shirts					22 18K	1		13 50	13 50
Shirts					22 21	1		19 50	19 50
Shirts					22 22B	1		16 50	16 50
Shirts					22 22K	1		13 50	13 50

ALL GOODS SOLD F. O. B. SHIPPING POINT. ALL CLAIMS MUST BE MADE WITHIN 5 DAYS.
OUR RESPONSIBILITY CEASES WITH DELIVERY TO CARRIER.

INVOICE TOTAL → 101 11

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1629

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Edward Engel, individually and d/b/a Engels Dept. 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 WASHINGTON MANUFACTURING CO. d/b/a OLD KENTUCKY MANUFACTURING CO

Plaintiff.....

Witness my hand this 16th day of March, 1927...

Wm. J. Smith, Clerk

RECORDED

No. 1629

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

WASHINGTON MANUFACTURING CO. d/b/a

OLD KENTUCKY MANUFACTURING CO. a corp
Plaintiffs

vs.

EDWARD ENGEL d/b/a ENGELS DEPT. STORE

Defendants

SUMMONS and COMPLAINT

Filed 3-16-51, 19

Angie Welch, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

March 16, 1951

Taylor Wilkins Sheriff
I have executed this summons

this 3-28, 1951

by leaving a copy with

Edward Engel

Taylor Wilkins Sheriff
Edw. Steadham Deputy Sheriff

ALLAN R. CAMERON
ATTORNEY AT LAW
FIRST NATIONAL BANK ANNEX
P. O. BOX 115
MOBILE 1, ALABAMA

March 15, 1951

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

MS 1629
Washington Manufacturing Co.
4/10/51

Re: Old Kentucky Manufacturing Co.
v. 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.

1629