

COTTEN-STRICKLAND PRINTING  
CO., INC., a corporation,

Plaintiff,

versus

PIONEER GIRLS' TOWN, INC.,  
a corporation,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 1443

PLAINTIFF'S MOTION FOR JUDGEMENT BY DEFAULT

Comes now Cotten-Strickland Printing Co., Inc. plaintiff  
in the above styled cause, and shows unto this Court that  
more than thirty (30) days have passed since the service of  
process on Pioneer Girls' Town, Inc., defendant in the  
above styled cause, and that the said defendant has failed  
to appear, answer, plead or demur to the complaint filed  
in said cause. The said Complaint consisted of two counts,  
in each of which the sum of EIGHT HUNDRED FOUR AND 19/100  
DOLLARS (\$804.19) with interest from to-wit, the 1st day  
of October 1949, was claimed, the first of said counts alleging  
that the said sum was due by itemized, verified account,  
and the second of said counts alleging that the said sum was  
due for work and labor done by the plaintiff for the defendant,  
as shown by the said itemized statement.

WHEREFORE, plaintiff prays that this Court will render judgment  
for the plaintiff in said cause in the sum of EIGHT HUNDRED  
SIXTEEN and 17/100 DOLLARS (\$816.17), being the aforesaid  
principal sum claimed and interest thereon for three months.

James Z. Wilts, Ambrecht & Johnson  
Attorneys for Plaintiff

IN THE CIRCUIT COURT OF  
SALADIN COUNTY, ALABAMA  
NO. 1443

COTTON-SPRINGFIELD PRINTING  
CO., INC., a corporation,  
Plaintiff,  
vs.  
PIONEER GIRLS' HOME, INC.,  
a corporation,  
Defendant.

COMPLAINT FOR DAMAGES

Comes now Cotton-Springfield Printing Co., Inc., Plaintiff  
in the above styled cause, and shows unto this Court that  
more than thirty (30) days have passed since the service of  
process on Pioneer Girls' Home, Inc., Defendant in the  
above styled cause, and that the said Defendant has failed  
to appear, answer, plead or demur to the complaint filed  
in said cause. The said Complaint consisted of two counts,  
in each of which the sum of EIGHT HUNDRED FOUR AND 12/100  
DOLLARS (\$804.12) with interest from to-wit, the 1st day  
of October 1949, was claimed, the first of said counts alleging  
that the said sum was due by Defendant, Pioneer Girls' Home, Inc.,  
and the second of said counts alleging that the said sum was  
due for work and labor done by the Plaintiff for the Defendant,  
as shown by the said itemized statement.  
WHEREFORE, Plaintiff prays that this Court will render judgment  
for the Plaintiff in said cause in the sum of EIGHT HUNDRED  
SIXTEEN AND 12/100 DOLLARS (\$816.12), being the aforesaid  
principal sum claimed and interest thereon for three months.

FILED

JAN 20 1950

AUDRE J. DUCK, Clerk

*Handwritten signature: J. B. Smith*  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Pioneer Girls Town, Inc, A Corporation

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 \_\_\_\_\_

Pioneer Girls Town, Inc. A Corporation, Defendant....

by \_\_\_\_\_

Cotten- Strickland Printing Company., Inc. A Corporation, Plaintiff....

Witness my hand this 6th day of December 1949....

Alice H. Smith, Clerk

Deputy Sheriff

COTTEN-STRICKLAND PRINTING,  
CO., INC., a corporation,

Plaintiff,

versus

PIONEER GIRLS' TOWN, INC.,  
a corporation,

Defendant.

0

0

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendant EIGHT HUNDRED FOUR AND 19/100 DOLLARS (\$804.19), due from the defendant by account on to-wit, the 1st day of October, 1949, which sum of money together with interest thereon is still due and unpaid. An itemized statement of the account sued on verified by the affidavit of a competent witness is attached hereto as Exhibit "A" and made a part hereof.

COUNT TWO

Plaintiff claims of the defendant the sum of EIGHT HUNDRED FOUR AND 19/100 DOLLARS (\$804.19), due from the defendant for work and labor done for the defendant, by the plaintiff on to-wit, the days as shown by the itemized statement attached hereto as Exhibit "A", which sum of money together with interest thereon is still due and unpaid.

*Inggo, Fultz, Armbrrecht & Jackson*  
Attorneys for Plaintiff

NOTE TO SHERIFF:

Service may be had on defendant by serving Mr. John Kaiser, Elberta,, Alabama.

Exhibit "A"

C-S

**COTTEN-STRICKLAND PRINTING CO., INC.**

Printing and Lithography

FAIRHOPE  
ALABAMA

to: Pioneer Girls Town  
c/o. Mr. Bernie Williams  
Lillian, Alabama

DATE: August 31, 1949

ORDER NO:

JOB NO:

Aug. 3	1,300 Business Cards, Job. Nos. 195 & 225. 400 Bernie Williams, 200 Lorraine Sibley Williams, 100 Major M. D. Stone, 100 Jack Dempsey, 100 William Macon, 100 J. A. Pilgram, 100 Quitman Phillips - - - - -	14.81
Aug. 5	10,000 Labels, three-color, Job No. 184	74.00
Aug. 8	100 Business Cards, Jno. Kaiser, Job No. 252	2.00
Aug. 10	10,000 Letterheads, two-color, Job No. 253	136.90
Aug. 15	100 Business Cards, Alfred New- man, Job No. 284	2.00
Aug. 16	1,000 4-ply Cards, "Make A Wish and Help a Girl", Job No. 285	8.05
Aug. 17	10,000 No. 10 Envelopes, Job No. 238,	58.10
Aug. 18	24,000 Decale Transfers, Job 231	240.80
Aug. 22	10,000 Descriptive Folders, Job No. 264	146.50
Aug. 26	1,000 Instruction Cards for Agents, Job No. 308	8.70
Aug. 29	500 Business Cards, John Kaiser, Job No. 351	3.85

(continued)

**C-S****COTTEN-STRICKLAND PRINTING CO., INC.***Printing and Lithography* FAIRHOPE  
ALABAMA

to: Pioneer Girls Town  
c/o. Mr. Bernie Williams  
Lillian, Alabama

DATE: August 31, 1949

ORDER NO.:

JOB NO.:

Aug. 29	500 Business Cards, John P. Gottler, Job No. 352	3.85
Aug. 29	1,800 Honorary Membership Certificates, two-color, Job No. 343	65.00
Aug. 30	2,000 Honorary Membership Cards, Job No. 365	17.80
	Sales Tax	17.65
	TOTAL - - - - -	\$900.01
	Sept. 24, Paid on Account	100.00
Sept. 29	500 Business Cards, F. E. Wilson, Job No. 519	3.85
	Sales Tax	.08
	Postage	.25
	GRAND TOTAL - - - - -	\$804.19

STATE OF ALABAMA X

COUNTY OF MOBILE X

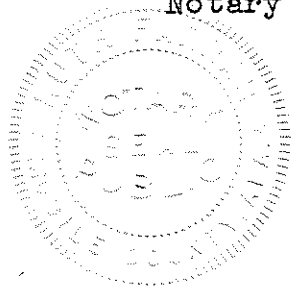
Before me, the undersigned Notary Public, in and for said county and state, personally appeared PAUL STRICKLAND, JR., known to me and known to me to be the President of the plaintiff in the above styled cause, who being by me first duly sworn on oath, deposes and says that the foregoing and attached itemized statement of the account is true and correct and that the said sum is unpaid and due and owing from the defendant to the plaintiff after allowing all just credits, and that the allegations of the said complaint and each count thereof are true.

Paul Strickland Jr.

Subscribed and sworn to before me,  
this 30<sup>th</sup> day of November, 1949.

Ruth Farrar

Notary Public, Mobile County, Alabama.





1443

Received in Sheriff's Office  
this 6 day of Dec. 1949  
TAYLOR WILKINS, Sheriff

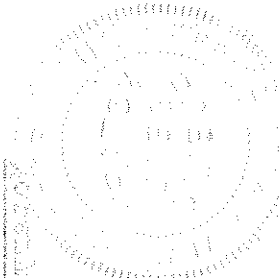
Cotton - Strickland  
Printing Co. Inc. a corp

VS.

Pioneer Girls Town, Inc.  
a corporation

Filed 12-6-49  
A. J. French  
clerk

RECORDED



Executed 12-7-1949  
by serving copy of within Summons and  
Complaint on

John A. Kaiser as president  
of Pioneer Girls Town Inc.  
a corp.

Taylor Wilkins Sheriff  
By Edleigh Steadham Deputy Sheriff

COTTEN-STRICKLAND PRINTING  
CO., INC., a corporation,

Plaintiff,

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Defendant.

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Inge, Wiltz, Ambrecht & Jackson  
Attorneys for Plaintiff

FILED

JAN 20 1950

ALICE L. DUCK, Clerk

FILED  
JAN 20 1950  
ALICE L. DUCK, Clerk