

1444

RALPH RUBIN, ELVIS RUBIN,  
LEON FRANKLIN AND NINON  
FRANKLIN doing business as:  
HALLIE LEE FROCKS COMPANY,  
A Partnership,  
Plaintiff

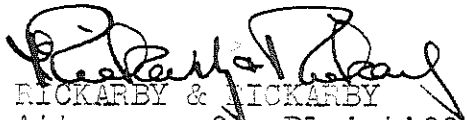
CIRCUIT COURT  
OF  
BALDWIN COUNTY, ALABAMA.

vs

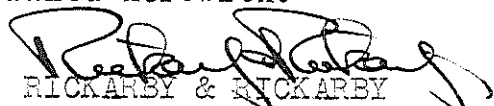
EDWARD W. ENGEL, Individually  
and doing business as:  
ENGEL'S DEPARTMENT STORE,  
Defendant

COMPLAINT

COUNT ONE: The Plaintiff claims of the Defendant the sum  
of ONE HUNDRED SIXTY-SEVEN and 76/100 DOLLARS (\$167.76) due from  
him by account, on, to-wit, April 30, 1948, which sum of money  
together with interest thereon is due and unpaid.

  
RICKARBY & RICKARBY  
Attorneys for Plaintiff

The debt upon which this action is based is evidenced by  
itemized verified statement of account filed herewith.

  
RICKARBY & RICKARBY  
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing &

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 EDWARD W. ENGEL, Individually and  
doing business as: ENGEL'S 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 W. ENGEL, Individually and d/b/as ENGEL'S DEPT. STORE, Defendant  
by RALPH RUBIN, ELVIS RUBIN, LEON FRANKLIN and NINON FRANKLIN, a  
Partnership, doing business as: HALLIE LEE FROCKS COMPANY, Plaintiff.

Witness my hand this 10<sup>th</sup> day of December 1949.

Reing. Leuch, Clerk

RECORDED  
Page

1444

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT

RALPH RUBIN, ELVIS RUBIN,  
LEON FRANKLIN AND NINON  
FRANKLIN, doing business as:  
HALLIE LEE FROCKS COMPANY  
Plaintiffs

vs.

EDWARD W. ENGEL, doing business  
as: ENGEL'S DEPARTMENT STORE  
Defendants

SUMMONS and COMPLAINT

Filed 12-10, 1949

Deborah A. Allen, Clerk

RICKARBY & RICKARBY

Plaintiff's Attorney S

Defendant's Attorney

Defendant lives at

Elberta, Alabama.

RECEIVED IN OFFICE

Dec. 10, 1949

Taylor Wilkins, Sheriff  
I have executed this summons

this 12-13, 1949  
by leaving a copy with

Edward W. Engel

Taylor Wilkins, Sheriff

Edolph Stoddard, Deputy Sheriff

## LAW OFFICES

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

ELLIOTT G. RICKARBY

E. G. RICKARBY, JR.

February 15, 1950

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

RE: RALPH RUBIN, et al, d/b/as: HALLIE LEE  
FROCKS VS EDWARD ENGEL

Dear Mrs. Duck:

Please have Judge Mashburn enter judgment  
by default on itemized statement for Plaintiff in the  
sum of \$134.53.

The defendant has paid fifty dollars on this  
account since filing suit and has fallen down on paying  
the balance. The account is as follows:

Amount sued for	\$167.76
Interest from April 30, 1948	<u>16.77</u>
to date of payment 1/9/50	
	\$184.53
paid	<u>50.00</u>
	\$134.53

Yours very truly,

RICKARBY & RICKARBY

By: 

EGRjr:hb  
709

cc - Engel's Department Store, Eleberta, Ala.  
cc - Dun & Bradstreet, Nashville, Tennessee.

COUNTY OF SHELBY

SL-188 (13743)

STATE OF TENNESSEE

RECORDED

Be it remembered, that on this 28 day of November  
A. D., 1949, personally appeared before me, the undersigned authority,  
Leon Franklin known to me  
who being duly sworn, upon his oath stated that he is a partner  
of Hellie Lee Frocks Company, Memphis, Tennessee  
{ a corporation organized and doing business under the laws of the State of  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of Ralph Rubin, Elvia Rubin, Leon Franklin and Ninon Franklin  
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 Hellie Lee Frocks Company; that the attached account against  
Edward W. Engel D/B/A Engel's Department Store \$167.76  
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 Edward W. Engel D/B/A Engel's Department  
Store  
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 One Hundred Sixty-Seven and 76/100 Dollars  
(\$167.76) with interest from May 1st 1949 1949 is justly due and  
remains unpaid.

Leon Franklin 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.

William A. Glover  
Notary Public

County of Shelby

State of Tennessee

My commission expires

JULY 2, 1950 A. D. 1950

**Banks, Inc.**

Manufacturers of "Hallie Lee" Frocks

242 Court Avenue

Memphis, Tennessee

11/30/49

Phone 37-7654

Engel's Dept. Store,

Elberta, Ala.

TOOF 569732

DATE	FOLIO	CHARGES	CREDITS	BALANCE
1948			BALANCE FORWARD	
SEP 1	204.65	51.86		51.86*.
SEP .10	204.66	26.15		78.01*.
SEP .20	208.07	26.01		104.02*.
SEP .27		CH	12.75-	91.27*.
SEP .28		CH	26.01-	65.26*.
FEB .18-1949			39.76-	25.50*.
APR 4	237.99	127.88		153.38*.
APR .14	237.75	36.88		190.26*.
APR .30	243.77	CH	22.50-	167.76*.

NOW KNOWN AS  
HALLIE LEE FROCKS CO.