

1779

CONSOLIDATED SHOE COMPANY, INC.,  
a Corporation,  
Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

-vs-

BESSIE ALLEGRI,  
D/b/a ALLEGRI'S READY-TO-WEAR,  
Defendant

C O M P L A I N T

COUNT ONE: The Plaintiff claims of the Defendant  
FIVE HUNDRED NINETY-FOUR and 40/100 DOLLARS (\$594.40), due  
from him by account, on the 10th day of November, 1951;  
which sum of money with interest thereon, is still unpaid.

RICKARBY & RICKARBY

By:  
E. G. Rickarby  
Attorneys for Plaintiff

The account sued on is evidenced by an itemized and  
verified statement of account and by affidavit filed herewith  
in Court.

RICKARBY & RICKARBY

By:  
E. G. Rickarby  
Attorneys 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 BESSIE A. ALLEGRI, doing business  
as ALLEGRI'S READY-TO-WEAR

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 BESSIE A.

ALLEGRI, d/b/a ALLEGRI'S READY-TO-WEAR, Defendant.

by CONSOLIDATED SHOE COMPANY, INC., a Corporation

\_\_\_\_\_, Plaintiff.

Witness my hand this 24<sup>th</sup> day of March 1952

Archie Alcock, Clerk

4/4/  
RECORDED

No. 1779 Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

CONSOLIDATED SHOE CO., INCL.,

A Corporation

Plaintiffs

vs.

BESSIE ALLEGRI, d/b/a

ALLEGRI'S READY-TO-WEAR  
Defendants

**SUMMONS and COMPLAINT**

Filed 3-24, 1952

Amelia ..., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

April 2, 1952  
Taylor Wilkins, Sheriff  
I have executed this summons

this 4-4, 1952  
by leaving a copy with

Bessie Allegri  
Doing Business as  
Allegri's Ready to  
wear

Taylor Wilkins Sheriff  
H. F. Hall Deputy Sheriff

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

21 March 1952

Mrs. Alice J. Duck  
Register  
Bay Minette, Ala.

Dear Mrs. Duck:

Re: Consolidated Shoe Co. Inc.  
Vs: Allegri's Ready-to-Wear

Enclosed find our check for \$15.00 together with summons and complaint and itemized and verified statement of account in the above styled cause.

Please issue process and am obliged,

Yours very truly,

RICKARBY & RICKARBY

By: *E. G. Rickarby, Jr.*

EGRjf/fc

1379

cc: Mrs. Allegri

cc: American Credit Indemnity Co.

1714

Consolidated Shoe Co., Inc  
a corp

vs.

Bussie Allegri d/b/a  
Allegri's Ready To Wear

VERNON & VERANDA  
SHOE STORE IS

Faint, mostly illegible text, possibly a list or index of items.

Vertical text on the right side of the page, possibly a date or reference number.

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

26 March 1952

Mrs. Alice J. Duck  
Clerk  
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Consolidated Shoe  
Vs: Allegri's

In this matter we phoned the Consolidated Shoe Company this morning. They have checked their records and do not find the payment about which Mrs. Allegri wrote you.

Under the circumstances we cannot hold up process and ask that you go ahead and issue papers.

In the meantime we are asking Mrs. Allegri to check her cancelled checks to see if the check she sent was processed. If we find this and the date, I will take the matter up with my client.

We have asked that if payment was made direct to client he notify us at once.

Yours very truly,

RICKARBY & RICKARBY

By: 

EGRjr/fc  
cc: client

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

7 May 1952

Mrs. Alice J. Duck  
Clerk  
Bay Minette, Alabama

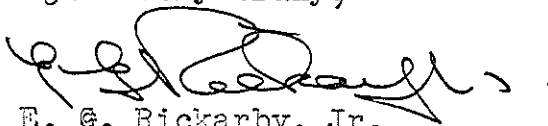
Dear Mrs. Duck:

Re: Consolidated Shoe Co.  
Vs: Allegri's

Request dismissal of suit of Consolidated Shoe Co, Inc.,  
-vs- Bessie Allegri, Case No. 1779, and return of bal-  
ance of cost due for which we hold your receipt No. 918  
for true!

Congratulations on the election return. It's a mighty  
fine day today!

Yours very truly,



E. G. Rickarby, Jr.

EGRjr/fc

1379

cc: Client

cc: Mrs. Allegri

STATE OF TEXAS

COUNTY OF ...

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1779

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# Affidavit to Claim

STATE OF VIRGINIA  
COUNTY OF CAMPBELL } ss.

Before me, the undersigned, a Notary Public, in and for the County and State aforesaid, personally appeared RICHARD A. CARRINGTON, JR. who being by me first duly sworn according to law, deposes and says that he is\* TREASURER of CONSOLIDATED SHOE COMPANY, INC.

- 1. A corporation organized and doing business under the laws of the State of VIRGINIA
- 2. A partnership composed of \_\_\_\_\_
- 3. A sole trader doing business as \_\_\_\_\_

and that as such he is authorized to make this affidavit; cognizant of the facts constituting the cause of action; that he is familiar with the books and business of said CONSOLIDATED SHOE CO., INC.

that the account against ALLEGRI'S of FAIRHOPE, ALABAMA hereto attached, marked "Exhibit A" and made a part hereof

is a true and correct copy of books of original entry, instrument of writing or claim, on which this action is brought, of CONSOLIDATED SHOE CO., INC.; that the goods for which said

charges were made were sold and delivered to the said ALLEGRI'S at HER special instance and request; that the charges made therefor are fair and reasonable and as per

contract, and that he promised to pay the sums charged; that credit has been duly given for all payments, counter claims and setoffs and that there is no usury therein; that said CONSOLIDATED SHOE CO., INC.

has no collateral or other security for the payment thereof and that there now remains due and owing from said ALLEGRI'S to CONSOLIDATED SHOE CO., INC.

the sum of FIVE HUNDRED NINETY FOUR DOLLARS AND FORTY CENTS\*\*\*\*\* Dollars, together with interest thereon from \_\_\_\_\_ 19\_\_\_\_\_

Subscribed and sworn to before me this 12th day of March 1952

Carl C. Cheatham Notary Public. Richard A. Carrington, Jr. L.S.

My Commission Expires April 12, 1952

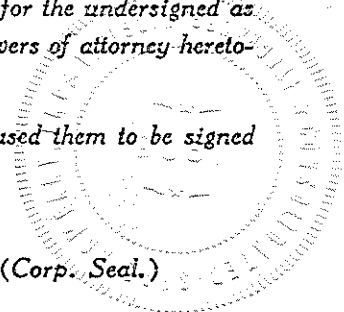
\*Treasurer, Member of Firm or Sole Proprietor.

## POWER OF ATTORNEY

To RICKARBY & RICKARBY

You or your representative endorsed hereon, are hereby appointed the attorney-in-fact for the undersigned, and each or either of you is authorized to attend any and all meetings of creditors or adjourned meetings of creditors of the above named debtor in any court or elsewhere, and for the undersigned to vote for or against any proposal or resolution that may be submitted in reference to the affairs or estate of the above named debtor; to accept or refuse any composition in or out of bankruptcy proposed by said debtor or his or its representatives; to receive, endorse, receipt for and collect any payments of dividends or fees or moneys due the undersigned under any composition or otherwise and in general to take such action and do such acts, execute such consents for the undersigned as you may deem best, as fully as the undersigned could do if personally present. And all powers of attorney heretofore executed by the undersigned in this proceeding are hereby revoked.

In Witness Whereof, the above named claimant has signed these presents or has caused them to be signed and its corporate seal affixed this 12th day of March 1952



CONSOLIDATED SHOE COMPANY

(Corporate or partnership name here)

Richard A. Carrington, Jr. - Treas L.S.  
(Name of officer, partner or individual here)

FOR CORPORATION

CITY OF Lynchburg,  
STATE OF Virginia  
COUNTY OF Campbell

SS:

On this 12th day of March, 1952, before me personally came

Richard A. Carrington, Jr., to me known, who being by me duly sworn, did depose

and say that he resides in Lynchburg, Virginia; that he is the Treasurer of the Consolidated Shoe Co., Inc., the corporation described in and which executed the above instrument; that he knew the seal of said corporation; that the seal affixed to said instrument was such corporate seal; that it was so affixed by order of the board of directors of said corporation, and that he signed his name thereto by like order;

*Carl C. Cheatham*

(Notary Public signs here)

My Commission Expires April 12, 1952

FOR PARTNERSHIP

CITY OF  
STATE OF  
COUNTY OF

SS:

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally came

\_\_\_\_\_ to me known and known to me to be one of the persons described in and who executed the foregoing instrument and who duly acknowledged that he executed the same, and who being by me duly sworn, did depose and say that he is a member of said partnership and is duly authorized to execute same on behalf of his said firm.

(Notary Public signs here)

FOR INDIVIDUAL

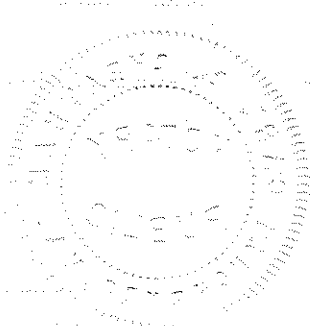
CITY OF  
STATE OF  
COUNTY OF

SS:

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally came

\_\_\_\_\_ to me known and known to me to be the individual described in and who executed the foregoing instrument and he duly acknowledged to me that he executed the same.

(Notary Public signs here)



American Credit Indemnity Co.  
of New York

FILED  
MAR 24 1952  
ALICE J. BUCK, Clerk

Affidavit to Claim

Debtor

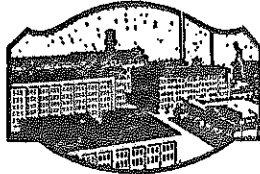
Against  
RECORDED

Claimant

2001774

# CONSOLIDATED SHOE COMPANY

Telephones  
2-2751 and 6-2231



Cable Address  
"Conshuco"

JULY 27, 1951

Six Specialty  
Factories

Lynchburg, Va.

SOLD TO ALLEGRI'S READY-TO-WEAR  
MRS. BESSIE A. ALLEGRI  
FAIRHOPE, ALA.

FUTURE PRICES SUBJECT TO CHANGE WITHOUT NOTICE.

TERMS: STRICTLY NET

60 DAYS

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SHIPPED TO:	ROBERTSDALE, ALA.				
	STK. NO.	PAIRS	PRICE		
	6126	12	3.35	40.20	
	6124	12	3.35	40.20	
	8513	12	2.00	24.00	
	8500	24	1.90	45.60	
	8532	24	2.00	48.00	
	8530	24	2.00	48.00	
	8521	12	2.00	24.00	
	7020	12	3.00	36.00	306.00

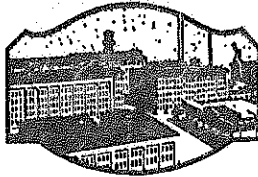
5

WE LAP NO BILLS • PROMPT PAYMENTS INSURE PROMPT SERVICE • REPORT ERRORS ON RECEIPT OF GOODS  
WE ACCEPT NO RETURNS WITHOUT OUR PERMISSION

07000

# CONSOLIDATED SHOE COMPANY

Telephones  
2-2751 and 6-2231



Six Specialty  
Factories

Cable Address  
"Conshuco"

AUG. 21, 1951

Lynchburg, Va.

SOLD TO ALLEGRI'S READY-TO-WEAR  
MRS. BESSIE A. ALLEGRI  
FAIRHOPE, ALA.

FUTURE PRICES SUBJECT TO CHANGE WITHOUT NOTICE.

TERMS: STRICTLY NET

60 DAYS

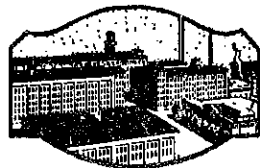
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SHIPPED TO:	ROBERTSDALE, ALA.			
	8517	12	2.00	24.00
	8515	23	2.00	46.00
	8511	24	2.00	48.00
	8507	24	2.10	50.40
	7012	12	3.00	36.00
	7022	12	3.50	42.00
	7023	12	3.50	42.00
				288.40

§

WE LAP NO BILLS • PROMPT PAYMENTS INSURE PROMPT SERVICE • REPORT ERRORS ON RECEIPT OF GOODS  
WE ACCEPT NO RETURNS WITHOUT OUR PERMISSION

# CONSOLIDATED SHOE Co.



PRINTED  
BY JCO

LYNCHBURG, VA. March 12th, 1952

M Allegri's

Fairhope, Ala.

THE FOLLOWING AMOUNT IS NOW DUE:

27	'51	60 days	\$ 306.00
21	"	60 days	288.40
10	"	60 days	91.20

TOTAL CHARGES - - - - - \$685.60

30	'51	Ret. Mdse.	91.20	<u>91.20</u>
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BALANCE DUE - - - - - 594.40