

2139

ALMUR S. WHITING

ATTORNEY AT LAW

TELEPHONES:  
OFFICE: 2-3604  
RESIDENCE: 6-6226

ANNEX, FIRST NATIONAL BANK BUILDING  
SUITE 708-9  
MOBILE 6, ALABAMA

P. O. BOX 988

Mar. 10, 1954.

Hon. Alice J. Duck, Clerk,  
Circuit Court,  
Bay Minette, Ala.

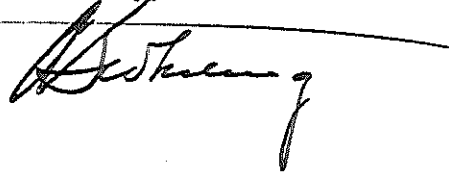
Dear Mrs. Duck: Re: Léver Bros. Co. vs. T. J. Davidson, Jr., d/b/a  
Davidson's Grocery.

Enclosed please find motion to be filed in the above cause by  
the plaintiff therein, which I would appreciate your having set down to  
be heard on your next motion day.

I would also thank you to let me know when same is set by means  
of the enclosed post paid, self addressed envelope, and oblige,

Yours truly,

ASW/e



2139

FILED

MAR 11 1954

Alice J. Duck, Clerk

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW

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

Lever Brothers Company,  
a corporation,

Plaintiff,

versus

T. J. Davidson, Jr., a sole  
trader as Davidson's Grocery,

Defendant.

Now comes the defendant and demurs to the complaint heretofore  
files in this cause and to each and every count thereof, separately  
and severally, and for grounds for said demurrer, separately and  
severally, assigns the following:

1. That said count does not state a cause of action.

Julius A. Madbury, Jr.  
ATTORNEY FOR DEFENDANT

The defendant respectfully requests that this cause be tried  
by jury.

FILED

1-9-54

ALICE J. DUCK, Clerk

Julius A. Madbury, Jr.  
ATTORNEY FOR PLAINTIFF

118-100

Ms Q139

Filed

1-9-54

Wiegman  
Parker

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

LEVER BROTHERS COMPANY, )  
a corporation, )  
  
Plaintiff, )

-vs-

T. J. DAVIDSON, JR., a sole )  
trader as DAVIDSON'S GROCERY, ) No. \_\_\_\_\_  
  
Defendant. )

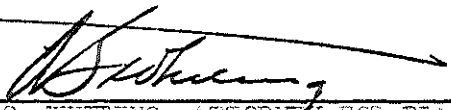
Now comes the plaintiff in the above styled cause, and shows unto the Court that the defendant heretofore filed demurrers to the cause to the complaint on the ground that the complaint fails to state a cause of action, and in addition thereto, demanded a jury trial; that the defendant through his attorney, stated to the court that such demurrers were filed merely for the purpose of delay, and give an opportunity for the defendant to pay the debt; that notwithstanding such representation and the filing of said demurrers and said demand for trial by jury, the defendant has failed and refused and continues to fail and refuse to pay the debt herein sued on.

Wherefore, the premises considered, the plaintiff prays for an order of this Court, requiring the defendant to be and appear before this Court to show cause if any he has, why judgment should not be rendered against him for the amount sued on in this cause, together with legal interest thereon, besides cost of this suit.

FILED

3-11-54

ALICE J. DUCK, Clerk

  
A. S. WHITING, ATTORNEY FOR PLAINTIFF.  
708-9 Annex, 1st National Bank Bldg.,  
Mobile, Ala.

62-111-100

FILED  
MAR 11 1954  
ALICE J. DICK, Clerk

RECEIVED  
MAR 11 1954  
U.S. DEPT. OF JUSTICE

LEVER BROTHERS COMPANY

PLAINTIFF

VS

T. J. DAVIDSON JR.

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 2139

PLEAS

Comes now the Defendant in the above styled cause and for answer  
to the Plaintiff's Complaint says:

1.

Not guilty.

2.

That he does not owe the Plaintiff the amount sued for, nor any amount.

Wilters & Brantley

FILED

BY:

*Roller M Brantley*  
Attorney for Defendant

6-10-54

ALICE J. DUCK, Clerk

2139

LEVER BROTHERS COMPANY

PLAINTIFF

VS

T. J. DAVIDSON JR.

DEFENDANT

PLEAS

FILED  
JUN 10 1954  
ALICE J. DUCK, Clerk



STATE OF NEW YORK  
COUNTY OF NEW YORK

BOOK 001 PAGE 304

Be it remembered, that on this 11TH.....day of.....SEPTEMBER.....A.D., 1953.,  
personally appeared before me, the undersigned authority, ...A. J. NATHANSON.....  
.....  
who being duly sworn, upon his oath stated that he is....ASSISTANT CREDIT MANAGER.....  
of LEVER BROTHERS COMPANY, 390 PARK AVENUE, NEW YORK 22, NEW YORK.....  
....., a corporation organized and doing business under the laws of the State of Maine and  
that as such he makes this affidavit; that he is familiar with the books and business of said LEVER BROTHERS COMPANY  
.....;  
that the attached account against....T. J. DAVIDSON, JR., DAVIDSON'S GROCERY.....  
of.....BAY MINETTE, ALABAMA.....is just and correct, within the knowledge of this  
affiant, that the items thereon stated and composing the said account were sold and delivered to said.....  
.....T. J. DAVIDSON, JR., DAVIDSON'S GROCERY.....  
at ~~his~~ their special instance and request; 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.....  
.....TWO HUNDRED FORTY FOUR AND 11/100THS.....Dollars (\$244.11.....) with interest  
from.....19.....is justly due and remains unpaid.

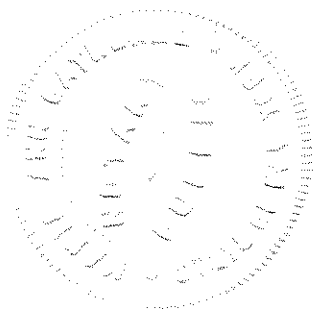
*A. J. Nathanson*  
under my official seal  
Sworn to and subscribed before me on the day and year first above stated.

County of NEW YORK

My commission expires .....

*Marie Ann Gatheral*  
MARIE ANN GATHERAL  
Notary Public, State of New York  
Notary Public  
State of NEW YORK  
Qualified in Kings County  
Certificates filed in the following offices:  
Register, Kings and New York  
Term Expires March 30, 1954.

A. D. 19.....



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW.

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

Lever Brothers Company,  
a corporation,

Plaintiff,

versus

T. J. Davidson, Jr., a sole  
trader as Davidson's Grocery,

Defendant.

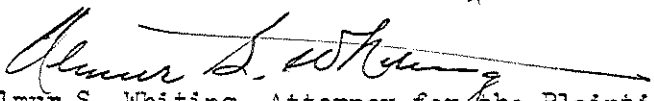
COUNT ONE.

The plaintiff claims of the defendant the sum of \$244.11 due from him to the plaintiff on account by and between the plaintiff and the defendant on and between towit, September 5, 1952, and November 26, 1952, as shown by itemized statement of account, verified by affidavit, hereto annexed, which said sum, with the interest thereon, is still unpaid.

FILED

11-10-53

ALICE L. BUCK, CLERK

  
Almur S. Whiting, Attorney for the Plaintiff,  
Suite 708-9 Annex 1st Nat. Bank Bldg.,  
Mobile, Alabama.

BOOK 001 PAGE 307

Wm. J. Fox

46 Sample A

~~7 1/2~~ 6 1/2  
256 1/2

Vanner K.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2139

Neb.

TERM, 19 53

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon T. J. DAVIDSON JR.

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

~~LEVER BROTHERS CO.~~

T. J. DAVIDSON JR.

, Defendant

by

LEVER BROTHERS CO.

, Plaintiff

Witness my hand this 30th day of November 1953

*W. J. Smith*

, Clerk

BOOK 001 PAGE 308

No. 2139 Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

LEVER BROTHERS CO.

Plaintiffs

vs.

T. J. DAVIDSON JR.

Defendants

**SUMMONS and COMPLAINT**

Filed 11-30-53, 1953

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov 30, 1953

Taylor Wilkin Sheriff

I have executed this summons

this 11/30, 1953  
by leaving a copy with

T. J. Davidson Jr.

Taylor Wilkin Sheriff  
Pete Sells Deputy Sheriff

# HOME OFFICE - SALES RECORD

## Lever Brothers Company

MAIL REMITTANCES TO:  
DIVISION OFFICE: 126 SPRING STREET N.W. ATLANTA, GEORGIA

DATE

CUSTOMER'S  
ORDER NO.  
ORDER DATE  
TERMS NO.

11-26-52

11-17-52

603

AS BELOW

BOOK

001

T. J. DAVIDSON, JR.  
(DAVIDSON'S GROCERY)  
P. O. BOX 355  
BAY MINETTE, ALA.

WAREHOUSE NO. 113

01 NC

DESCRIPTION	WEIGHT	PRICE	AMOUNT
LUX FLAKES 24	530	6 25	6 25
LUX TOILET SOAP 1/4 LB		10 10	10 10
LUX TOILET SOAP BATH 100		10 10	10 10
BREEZE 24 W/PRM		7 00	21 00
BREEZE 12 W/PRM		6 88	13 76
SURF #533		6 63	6 63
SILVER DUST 24 W/PRM		6 50	32 50
SILVER DUST 12 W/PRM		6 38	12 76

113 10

PART ORDER BAL.  
ON INV. 51340 NO

J 11-21

# HOME OFFICE SALES RECORD Lever Brothers Company

MAIL REMITTANCE TO:  
DIVISION OFFICE 1259 SPRING STREET, N.W., ATLANTA, GA. 30303

17

AS BELOW

BOOK 001

ORDER NO. 9-011-79  
ORDER DATE 8/27/52  
TERMS NO. 602

BOOK 001 PAGE 306

SHIPPED TO  
BY  
DESTINATION  
ROUTE

T J DAVIDSON JR  
DAVIDSON GROC  
BAYMINETTE ALA  
DOOR DELIVERY

WAREHOUSE NO. 113  
01 NC

DESCRIPTION WEIGHT

QTY	DESCRIPTION	WEIGHT	PRICE	TOTAL
1	LIFEBUOY 144	310	10	10
1	RINSO 40		10	10
2	RINSO 24		10	20
1	RINSO 12		10	10
2	LUX TOILET #172 (72'S)	266	10	20
1	LUX TOILET BATH SIZE 100		10	10
1	SWAN-REG 100		10	10
2	BREEZE 24 PC		10	20
1	BREEZE 12 DT		10	10
3	SILVER DUST 24 PC		10	30
2	SILVER DUST 12 DT		10	20

112 26

V.D.

58/29

PLEASE PRINT IF PAYEE DUE ACCOUNT REMAINS UNPAID

THIS CHECK IS NOT VALID UNLESS IT IS SIGNED BY THE ACCOUNTANT OR THE PERSON AUTHORIZED TO SIGN FOR THE ACCOUNT. IT IS THE RESPONSIBILITY OF THE ACCOUNTANT TO SIGN THIS CHECK. IT IS THE RESPONSIBILITY OF THE PERSON AUTHORIZED TO SIGN FOR THE ACCOUNT TO SIGN THIS CHECK. IT IS THE RESPONSIBILITY OF THE ACCOUNTANT TO SIGN THIS CHECK. IT IS THE RESPONSIBILITY OF THE PERSON AUTHORIZED TO SIGN FOR THE ACCOUNT TO SIGN THIS CHECK.

# HOME OFFICE SALES RECORD Lever Brothers Company

MAIL REMITTANCES TO:  
DIVISION OFFICE 126 SPRING STREET N.W. ATLANTA, GEORGIA  
DATE

AS BELOW

BOOK

001

CUSTOMER'S ORDER NO.  
ORDER DATE  
TERM NO.

11-28-52  
11-17-52  
603

T. J. DAVIDSON, JR.  
(DAVIDSON'S GROCERY)  
P. O. BOX 355  
BAY MINETTE, ALA.

WAREHOUSE NO. 113

01 NC

DESCRIPTION

WEIGHT

PRICE

AMOUNT

1	LUX FLAKES 24	530	6 25	6 25
1	LUX TOILET SOAP 48		10 10	10 10
1	LUX TOILET SOAP BATH 100		10 10	10 10
3	BREEZE 24 W/PRM		7 00	21 00
1	BREEZE 12 W/PRM		6 88	13 76
1	SURE 8533		6 63	6 63
3	SILVER DUST 24 W/PRM		6 50	32 50
2	SILVER DUST 12 W/PRM		6 38	12 76

113 10

PART ORDER BAL.  
ON INV. 51340 NO

J 11-21

AMOUNT OF PARTIAL PAYMENT REMAINS UNPAID



## STATEMENT

**LEVER BROTHERS COMPANY**

██████████ 390 PARK AVENUE  
 NEW YORK ██████ N. Y.

September 11, 1953

BOOK

001 PAGE 305

•  
 T. J. Davidson, Jr.  
 Davidson's Grocery  
 P. O. Box 355  
 Bay Minette, Alabama

TERMS: 2% - SOAP - SOAP POWDERS - SPRY - DENTRIFICES - COSMETICS  
 1% - COVO - COVO S.S. - COVO S.M. - HYDORA  
 FOR CASH WITHIN 10 DAYS FROM DATE OF INVOICE OR 30 DAYS NET.  
 NET 10 DAYS - OLEOMARGARINE - MAYONNAISE, SALAD OILS

		DR.	CR.
9/5/52	#46889	\$112.26	
10/17	cash		\$112.26
11/14	protested check	112.26	
11/26	#51341	113.10	
11/26	#51340	18.75	
		<u>\$244.11</u>	

This statement shows all open items on your account. Please write us if your records do not agree. If they do, may we have prompt settlement of invoices over 30 days old.