

N & W INDUSTRIES, INC.,

))

Plaintiff,

-vs-

))

T. J. DAVIDSON, JR.,

NO. 2149

Defendant.))

COUNT ONE.

Plaintiff claims of the Defendant the sum of \$210.25, due from him to the plaintiff on account by and between defendant and the plaintiff, on and between, to-wit: November 24, 1952 and March 25, 1953, as shown by itemized statement of account, verified by affidavit, hereto annexed, which said sum with the interest thereon is still unpaid.

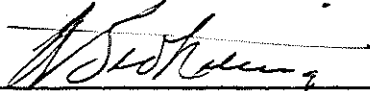
COUNT TWO.

Plaintiff further claims of the Defendant the sum of \$210.25, due from him to the plaintiff by account stated by and between plaintiff and defendant, on to-wit: March 25, 1953, which said sum with the interest thereon is still unpaid.

FILED

12-11-53

ALICE I. DUCK, Clerk


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

100-100000

100-100000

100-100000

FILED

DEC 11 1953

Alice T. Duck, Registrar

SUMMONS AND COMPLAINT.

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2117

Dec.

TERM, 1953

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

T. J. Davidson

, Defendant.

by N. & W. Industries Inc.

, Plaintiff.

Witness my hand this 11th day of Dec. 1953

Archie A. French

, Clerk

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No. 2147

Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

N. & W. Industries, Inc.

Plaintiffs

vs.

T. J. Davidson, Jr.

Defendants

SUMMONS and COMPLAINT

Filed Dec. 11th, 1953

Alice J. Duok, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Ala.

RECEIVED IN OFFICE

December 12, 1953

Taylor Wilkins, Sheriff

I have executed this summons

this 12/14, 1953
by leaving a copy with

T. J. Davidson, Jr.

We the jury find
for the plaintiff in
the amount of \$210.75
plus interest at 6%
from Nov. 20, 1952
Net \$15.75 D. J. French

Taylor Wilkins Sheriff
Pat D. Allen Deputy Sheriff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

N & W INDUSTRIES, INC.,

)

Plaintiff,

)

-vs-

NO. _____

T. J. Davidson, Jr.,

)

Defendant.

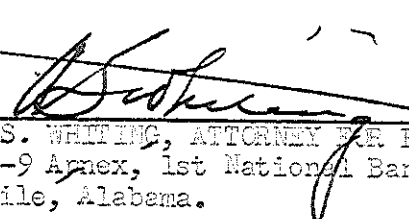
)

Now comes the defendant 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 to 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, Alabama.

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

N & W INDUSTRIES, INC.,

Plaintiff,

-VS-

T. J. DAVIDSON, JR.,

Defendant.

No. _____

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.

J. H. 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

J. H. A. Madbury, Jr.
ATTORNEY FOR PLAINTIFF

2147

Filed 1-9-54
Arlene J. Lane
Clerk

N. & W. INDUSTRIES, INC.

PLAINTIFF

VS

T. J. DAVIDSON JR.,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 2117

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

BY:

Robert M Brantley
Attorney for Defendant

FILED

6-10-54

ALICE J. DUCK, Clerk

2147

N. & W. INDUSTRIES, INC.

PLAINTIFF

VS

T. J. DAVIDSON, JR.

DEFENDANT

PLEASE

FILED
JUN 10 1954
ALICE J. DUCK, Clerk

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

Dec. 10, 1953.

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

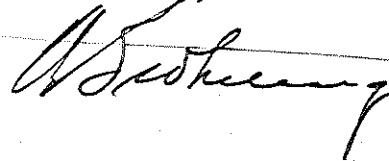
Dear Mrs. Duck: Re: N & W Industries, Inc. vs. T. J. Davidson, Jr.

I beg to send you herewith original and copy of complaint in the above matter, upon which please issue process for delivery to the Sheriff for service on the defendant.

Will you please be so kind as to advise me when service has been had on Mr. Davidson. For that purpose, I enclose a self addressed, post paid envelope.

ASW/e

Yours truly,



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.

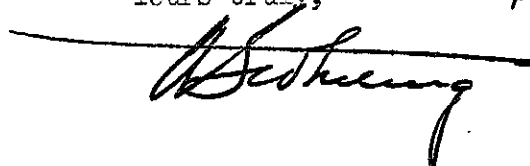
Hon. Alice J. Duck, Clerk,
Circuit Court,
Bay Minette, Ala.

Dear Mrs. Duck: Re: N & W Industries vs. T. J. Davidson, Jr.

Please find enclosed 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.

Will you kindly advise me by means of the enclosed self addressed, post paid envelope when the motion will come up, and oblige,

Yours truly,

A handwritten signature in dark ink, appearing to read "A. S. Whiting", is written over a horizontal line.

2147

COUNTY OF Hinds

STATE OF Mississippi

BOOK 001 PAGE 321

Be it remembered, that on this 7th day of December
A. D., 1953, personally appeared before me, the undersigned authority,

M. D. Hardy known to me
who being duly sworn upon his oath, stated that he is Assistant Secretary
of N + N Industries Inc

{ a corporation organized and doing business under the laws of the State of Virginia
and has been duly authorized by said corporation to make this affidavit

~~{ a partnership composed of~~

~~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 N + N Ind. Inc
that the attached account against L. J. Davidson Jr of Bay Minette, Ala
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 L. J. Davidson Jr

at its special instance and request, that credit has been duly given for all payments and just and law-
their
his

ful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the
sum of two hundred ten & 25/100 Dollars (\$ 210²⁵) with interest from Nov 20, 1952
1953 is justly due and remains unpaid.

M. D. Hardy 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 Miss

and that the foregoing was subscribed and sworn to before me on the day and
year first above stated.

R. O. Dees

Notary Public

County of Hinds State of Miss
My commission expires 3/16 A. D., 1954

Quality Thru-Out
For Over 50 Years

N & W INDUSTRIES, INC.

Manufacturers of

High N & W Grade

OVERALLS, PANTS AND WORK SHIRTS

JACKSON, MISSISSIPPI

October 20, 1952

Invoice No.

48559

SOLD TO

T. J. Davidson, Jr.
Box 355
Bay Minette, Alabama

BOOK 001 PAGE 322

SALESMAN

M. E. Page

RAIL	TRUCK	EXPRESS	TERMS: 1% 10 Days. 30 Days Net					
DOZEN	LOT NO.	PRICE	OVERALLS COATS	SHIRTS	PANTS	FGHT. P. P. EXPRESS	DISCOUNT	TOTAL
Dixie Truck								
1	429	22.50		22.50				
6/12	102C	21.00	10.50					
6/12	91BC	42.00	21.00					
7/12	210C	36.00	21.00					
1	97	21.75			21.75			
10/12	201V	34.00	28.33					
1	1	32.00			32.00			
8/12	109	17.50			11.67			
10/12	110	21.00			17.50			
1	112	24.00			24.00			210.25*

NO RETURNED MERCHANDISE WILL BE ACCEPTED UNLESS CLAIM IS REGISTERED WITH OUR OFFICE WITHIN 5 DAYS FROM DATE SHIPMENT IS RECEIVED

N & W INDUSTRIES, INC.

Manufacturers of

HIGH **N & W** GRADE

PANTS - SHIRTS - OVERALLS - COATS

SLACKS AND SPORT CLOTHING

JACKSON, MISS.

Aug 10, 1953

BOOK 001 PAGE 323

- T. J. Davidson, Jr.
- Box 355
- Bay Minette, Alabama

12

INVOICE NO.	CHARGES	CREDITS	BALANCE
FORWARDED			
24 '52 4143	173.84		
25 '52 4386	35.60		
26 '52 4624	28.81		
3 '52 5493	6.33		
8 '52 6294	11.47		
16 '52 7614	52.49		
18 '52 7920	21.64		
26 Ok		119.93	210.26*

PAY LAST AMOUNT SHOWN IN THIS COLUMN ↑

RECIATE YOUR BUSINESS. THIS STATEMENT COVERS ITEMS THROUGH THE 25TH OF THE MONTH.

PER CENT MAY BE DEDUCTED FROM ALL INVOICES NOT OVER TEN DAYS OLD.