

SUMMONS

STATE OF ALABAMA)
BALDWIN COUNTY) TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon LEE NOWELL, d/b/a FABRIC FAIR, ROUTE 1, FOLEY, ALABAMA, to appear within thirty days after the service of this summons in the Circuit Court to be held for said county, then and there to demur or plead to the complaint of Simplicity Pattern Company.

This 19th day of May, 1972

Eunice B. Blackmon
CLERK

* * * * *
SIMPLICITY PATTERN CO., INC.)

Plaintiff)

vs.)

LEE NOWELL, d/b/a)

FABRIC FAIR)

Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO 10, 413

COMPLAINT

The Plaintiff Simplicity Pattern Company, Inc. claims of the Defendant, Lee Nowell, d/b/a Fabric Fair, One Thousand Twenty-Six and 55/100ths Dollars (\$1,126.55) due from the Defendant by account from December 1, 1971, which sum of money with interest thereon is still unpaid.

An itemized account, verified by the affidavit of a competent witness will be used in evidence on the trial of the causes and said account is filed with the complaint at the time of filing.

FILED

MAY 19 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Daniel E. Robison
Daniel E. Robison
Attorney for Plaintiff

Request Duplicate *Attention*
SIMPLICITY PATTERN Co.
VS
H. LEE NOWELL

(CASE No. 10,413)

Sam Byrd

10,413

Simplicity Pattern
Co., Inc.

vs:

J. C. Howell, d/b/a
Fabric Fair

FILED

MAY 19 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

MAY 19 1972

TAYLOR WILKINS
SHERIFF

Daniel E. Robinson

Sheriff Claims 12 miles at
Ten Cents per mile Total \$ 1.20
TAYLOR WILKINS, Sheriff
BY Robert F. Stewart
DEPUTY SHERIFF

Received 19 day of May 1972
and on 25 day of 5 1972
I served a copy of the within
on J. C. Howell, d/b/a

By service on J. C. Howell

TAYLOR WILKINS, Sheriff
BY Robert F. Stewart D. S.

NEW YORK
STATE OF ~~ALABAMA~~)
NEW YORK
~~DADE~~ COUNTY)

VERIFICATION OF ACCOUNT

Before me, the undersigned authority on this day personally appeared L. Lang known to me, who being by me duly sworn states on oath that the foregoing and annexed account in favor of Simplicity Pattern Co, Inc. against H. Lee Nowell, d/b/a Fair Fabric for the sum of \$1,126.55

is within the knowledge of affiant, just and true; that it is due and unpaid and that all lawful offsets, payments and credits have been allowed.

L. Lang
Affiant

Subscribed and sworn to before me this 25th. day of

APRIL 1972.

Affix Notary Seal:

Louis Brown
Notary Public

LOUIS BROWN
Notary Public, State of New York
No. 41-6481375 Queens County
Cert. Filed in New York County
Term Expires March 30, 1974

SUMMARY STATEMENT

TRADE NAME Fabric Fair
 OWNERSHIP Mr. H. Lee Nowell
 STREET P. O. Box 129 CITY Elberta STATE Alabama

ACCOUNTS	BILLING DATES			DEBITS	CREDITS		BALANCE
					CASH	OTHER	
<u>CURRENT (A) Charges</u>	1	1	71	668 65			
<u>Interest</u> <u>REMARKS</u> <u>fr. 6/3/70</u>	1	1	71	3 75			
<u>thru 12/31/70</u>							
<u>Nov-70 Desc. ex.</u>	2	1	71	254 22		213 90	
<u>+ M Return Ch-</u>	2	1	71			4 62	
<u>HC Return</u>	3	1	71	155 89		3 36	
<u>Jan 71 - disc ex</u>	4	1	71	109 75		154 93	
	5	1	71	114 15			
<u>April 71 - desc. ex</u>	6	1	71	177 88			
<u>Interest fr 1/1/71 - thru 6/30/71</u>	7	1	71	105 11		283 38	
	7	1	71	3 75			
<u>Addit. Jan 71 - disc ex</u>	8	1	71	136 02		4 13	
<u>Pattern ex - Inv #217115R</u>	8	1	71			81 70	
<u>(4/4/71)</u>							
<u>NC Return Credit</u>	12	1	71			6 60	
TOTALS				1729 17		752 62	976.55
DEFERRED:							—
STANDING DEBIT - PATTERNS (B)							150.00
STANDING DEBIT - FIXTURES (C)							—
TOTAL INDEBTEDNESS							1126.55

DATE COMPILED 1/12/72 BY Lene Sturgeon

NOTES (TERMS):

- (A) - NET CASH - 10 days from cycle date of monthly invoice-statement.
 (B) - UPON TERMINATION - may be liquidated by cash and/or return of live patterns in good saleable condition @ 100% of cost, transportation prepaid, to our plant at Niles, Mich.
 (C) - UPON TERMINATION - payable in cash - (purchase price less accrued credits due under terms of service agreement).

FEIBELMAN & SILVER

ATTORNEYS AT LAW

2103 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA 36601

HERBERT P. FEIBELMAN, JR.

IRVING SILVER

DANIEL E. ROBISON

July 26, 1972

P. O. BOX 2082

TELEPHONE 205 433-1597
205 438-9717

Mrs. Eunice Blackmon
Clerk-Baldwin County Circuit Court
Bay Minette, Alabama 36507

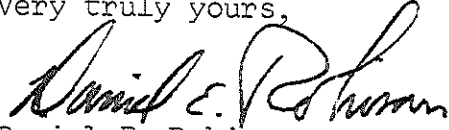
Re: Simplicity Pattern Company, Inc.
Vs: Lee Nowell, d/b/a Fabric Fair
Case No. 10,413

Dear Eunice:

From checking our records, I see that the Defendant has been served and more than thirty days have passed without an answer.

Please submit this docket sheet and file to the Judge for a default judgment. Our judgment should be in the amount of \$1,126.55.

Very truly yours,


Daniel E. Robison

DER/lc

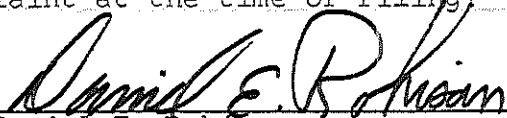
SIMPLICITY PATTERN COMPANY, INC. * IN THE CIRCUIT COURT OF
Plaintiff * BALDWIN COUNTY, ALABAMA
vs. * AT LAW
LEE NOWELL, d/b/a *
FABRIC FAIR *
Defendant * Case No. 10,413

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled cause and amends his complaint so as to read as follows:

The Plaintiff, SIMPLICITY PATTERN COMPANY, INC., claims of the Defendant, LEE NOWELL, d/b/a FABRIC FAIR, One Thousand One Hundred Twenty-Six and 55/100 Dollars (1,126.55) due from the Defendant by account from December 1, 1971, which sum of money with interest thereon is still unpaid.

An itemized account, verified by the affidavit of a competent witness will be used in evidence on the trial of the causes and said account is filed with the complaint at the time of filing.


Daniel E. Robison
Attorney for Plaintiff
P.O. Box 2082
Mobile, Alabama 36601

SERVE DEFENDANT:

Lee Nowell

Drive West from Foley on U.S. 98, turn right and continue thence northward along that road until it dead ends, where Lee Nowell lives in a white frame house on that corner.

FILED

JUN 8 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND/COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,413

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lee Nowell, d/b/a Fabric Fair

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.....

Lee Nowell, d/b/a Fabric Fair, Defendant.....

by Simplicity Pattern Company, Inc.

Plaintiff.....

witness my hand this 8th day of June 19 72

Eunice B. Blackmon, Clerk

No. 10,413

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

SIMPLICITY PATTERN COMPANY, INC.

Plaintiffs

VS.

LEE NOWELL, d/b/a FABRIC FAIR

Defendants

Amended
SUMMONS AND COMPLAINT

Filed June 8, 1972

Eunice B. Blackmon Clerk

FILED

JUN 8 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

JUN 8 1972

TAYLOR WILKINS
Daniel E. Robison

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

JUN 8 1972

TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this June 10 1972

by leaving a copy with

See Nowell

Sheriff claims 75 miles at

Ten Cents per mile Total \$ 7.50

TAYLOR WILKINS, Sheriff

BY *Deborah*
DEPUTY SHERIFF

Deborah Sheriff

Deborah Deputy Sheriff