

Anderson's Men's Wear, Inc., ) In the Circuit Court of  
 a corporation, )  
 Plaintiff, ) Baldwin County, Alabama  
 Vs. ) At Law  
 E. C. Rhodes, Jr., )  
 Defendant. ) No. 2220

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FOURTEEN AND 60/100 (\$114.60) DOLLARS, due from him by a certain judgment which was recovered by the Plaintiff against the Defendant in the County Court of Harrison County, Mississippi, on, to-wit, the 10th day of March, 1952, for the sum of ONE HUNDRED FORTY TWO AND 07/100 (\$142.07) DOLLARS, together with legal interest on said sum from the 10th day of March, 1952, together with the sum of TEN AND 90/100 (\$10.90) DOLLARS as costs of Court.

The Plaintiff avers that the amount of ONE HUNDRED FOURTEEN AND 60/100 (\$114.60) DOLLARS of said judgment has not been paid, and that the Defendant is indebted to the Plaintiff in said amount, together with the interest thereon.

COUNT TWO

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FOURTEEN AND 60/100 (\$114.60) DOLLARS due from him by account stated between Plaintiff and Defendant from, to-wit, the 6th day of November, 1953, which sum of money, with interest thereon, is still due and unpaid.

*J. Ferry Reynolds, Jr.*  
*William R. Lawrence*  
 Attorneys for Plaintiff

DEFENDANT'S ADDRESS:

c/o Grand Hotel  
 Point, Clear, Alabama  
 He is employed as executive chef  
 of Grand Hotel, Point Clear, Ala.

FILED

3-29-54

ALICE L. DUCK, Clerk

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SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2220

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon E. C. Rhodes, 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

E. C. Rhodes, Jr., Defendant

by Anderson's Men's Wear, Inc., a corporation

Plaintiff

Witness my hand this 29th day of March 1954

*Archie Leach*, Clerk

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No. 2220 Page

The State of Alabama

Baldwin County

CIRCUIT COURT

Anderson's Men's Wear, Inc.,

a corporation

Plaintiffs

vs.

E. C. Rhodes, Jr.,

Defendants

Summons and Complaint

Filed 29th March 1954

*W. C. French* Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 30 1954

*Taylor Williams*, Sheriff

I have executed this summons

this 13 April 1954

by leaving a copy with

*E. C. Rhodes, Jr.*

*Taylor Williams* Sheriff

*W. C. French* Deputy Sheriff

BRUCE G. CORNELL  
ATTORNEY AT LAW  
506 HEWES BUILDING  
GULFPORT, MISSISSIPPI

29 May, 1954

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minnette, Alabama


Re: #2220, Andersons Mens Wear  
Vs: E. C. Rhodes, Jr.

Dear Mrs. Duck:

Enclosed herewith please find Andersons Mens Wear check #4022  
in the amount of \$9.15 to your order, to cover costs in the sub-  
ject suit, as per the cost bill which I also enclose.

We will appreciate your dismissing this suit at your convenience.

Yours very truly,



cc: Hon. J. Terry Reynolds, Jr.  
Attorney-at-Law  
Mobile, Alabama

deposited  
June 1

RECEIVED  
JUN 1 1961  
FBI - NEW YORK

222 U

LAW OFFICES OF  
J. TERRY REYNOLDS, JR.  
ATTORNEY AT LAW  
605-6 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA  
TELEPHONE 3-3661

WILLIAM R. LAUTEN

April 23, 1954

Mr. Alice J. Duck  
Clerk, Circuit Court of  
Baldwin County  
Bay Minette, Alabama

Re: Anderson's Men's Wear  
Vs: E. C. Rhodes, Jr.

Dear Mrs. Duck:

Please send me a Court costs bill on dismissal in the  
above case. Mr. Rhodes has agreed to pay the account in full  
on May 11, 1954.

Very truly yours,

*J. Terry Reynolds, Jr.*  
J. Terry Reynolds, Jr.

JTR/am

P. S. Please do not dismiss the case until we notify you.

*J. T. R.*  
J. T. R.

J. TERRY REYNOLDS, JR.  
ATTORNEY AT LAW  
605 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA  
TELEPHONE 3-3661

March 27, 1954

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

Re: Anderson's Men's Wear  
Vs: E. C. Rhodes, Jr.

Dear Mrs. Duck:

Please find enclosed herewith a complaint in the above styled case.

Will you please file this complaint and issue a summons to the Defendant. He resides at the Grand Hotel in Point Clear, where he is employed as chief chef. I would appreciate your advising the Sheriff of his address, when you give him the summons and complaint.

Will you kindly advise us when the Defendant has been served.

Thanking you, and with best personal wishes, I am

Yours very truly,

*William R. Lauten*  
WILLIAM R. LAUTEN

WRL:bw