

BROADWAY MERCHANDISING COMPANY,
a Partnership

PLAINTIFF

VS

MABEL M. PRUITT,
Individually and
doing business as

BELFOREST MERCANTILE COMPANY,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

26472

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant TWO HUNDRED SIXTY-NINE DOLLARS AND THIRTY-TWO CENTS (\$269.32) due from her by account on the 23rd day of February, 1955, which sum of money with interest thereon is still unpaid.

COUNT II


The Plaintiff claims of the Defendant TWO HUNDRED SIXTY-NINE DOLLARS AND THIRTY-TWO CENTS (\$269.32) due from her for merchandise, goods, and chattels sold by the Plaintiff to the Defendant on, to-wit, the 19th day of March, 1954, which sum of money with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant TWO HUNDRED SIXTY-NINE DOLLARS AND THIRTY-TWO CENTS (\$269.32) due from her on accounts stated between the Plaintiff and the Defendant on, to-wit, the 23rd day of February, 1955, which sum of money with interest thereon is still unpaid.

RICKARBY AND RICKARBY

BY


Attorney for Plaintiff

Note: The account sued on is evidenced by itemized and verified statement filed herewith.

RICKARBY AND RICKARBY

BY


Attorney for Plaintiff

SUMMONS AND COMPLAINT

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 MABEL M. PRUITT

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 MABEL M. PRUITT,

Individually and d/b/a BELFOREST MERCANTILE COMPANY, Defendant....

by BROADWAY MERCHANDISING COMPANY, a Partnership

....., Plaintiff....

Witness my hand this 29th day of June 1955...

Beice J. Henshaw, Clerk

State of New York
City of of New York
County of New York } ss.

Samuel B. Austen
being duly sworn, doth depose and say, that he is Partner of BROADWAY MERCHANDISING CO
487 Broadway, N.Y.C. (a partnership) that the annexed statement of the account of
Belfarest Merc. Co.

~~Exclusively~~ doing business at R 1 Box 115 , Daphne , Alabama

in the State of is just, true and correct, that there is now due
the sum of Two hundred Sixty Nine dollars & Thirty Two Cents (\$269.32) Dollars,
that no part thereof has been paid or satisfied, and that there are no set offs, or counterclaims thereto
to the knowledge or belief of deponent.

Samuel B. Austen
Samuel B. Austen, Partner

Sworn to before me, this 17
day of June 1957

Bernard Sanders

BERNARD SANDERS
Notary Public, State of New York
No. 30-3444100
Qualified in Nassau County
Cert. filed with N. Y. Co. Clks & Reg. Off.
Commission Expires March 30, 1957

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

June 27, 1955

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

Dear Mrs. Duck:

Inre: Broadway Merchandising Co.
vs
Belforest Mercantile Co.
Our File: 3323

With this we are handing you Summons and Complaint,
itemized and verified statement of account, together
with check for \$15.00, deposit for costs, in the
above matter.

Please process and oblige.

Yours very truly,



EGR/fm
Encl.
7-8-55

cc: Dun & Bradstreet, Inc.
New York