

ELLIOTT G. RICKARBY

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

September 23, 1955

2734

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

Dear Mrs. Duck:

Inre: Cedar Shoe Company
vs
Wesley Parr
Our File: 3337

With this we are handing you Complaint and Summons
in the above styled cause, itemized and verified
statement of account, and ehck for costs in the
sum of \$15.00.

Please process and oblige,

Yours very truly,



EGR/fm
Encl.

cc: Frost-Arnett Co.
dup.

CEDAR SHOE COMPANY,
A CORPORATION,

PLAINTIFF

VS

WESLEY PARR

DEFENDANT

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2733

Comes now the Defendant in the above styled cause and for answer to
the Plaintiff's complaint and each and every count thereof says:

1.

Not guilty.

Walters & Brantley

BY:

Julius M Brantley
Attorneys for the Defendant

CEDAR SHOE COMPANY.
A CORPORATION,

PLAINTIFF

VS

WESLEY PARR

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

NO. 2733

DEMURRERS

Comes now the Defendant in the above styled cause and demurs to the Plaintiff's Complaint and to each and every count thereof and for grounds therefor says:

1.

The Plaintiff fails to state a cause of action.

2.

Count 1 and Count 2 purports to be itemized and verified statements of account, yet fails to incorporate the verification in the Pleas by proper reference.

Wilters & Brantley

BY:

James M Brantley
Attorneys for Defendant

The defendant demands a trial by jury.

Wilters & Brantley

BY:

James M Brantley
Attorneys for the Defendant

CEDAR SHOE COMPANY,
a Corporation

PLAINTIFF

VS

WESLEY PARR,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of SIX HUNDRED SEVENTY-ONE DOLLARS AND FIFTY-SIX CENTS (\$671.56) due from him for account on, to-wit, the 22nd day of October, 1954; which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant the sum of SIX HUNDRED SEVENTY-ONE DOLLARS AND FIFTY-SIX CENTS (\$671.56) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between, to-wit, the 27th day of March, 1954, and the 22 day of October, 1954; which sum of money with interest thereon is still unpaid.

RICKARBY AND RICKARBY

BY


Attorney for the Plaintiff

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

RICKARBY AND RICKARBY

BY


Attorney for the Plaintiff

STATE OF WISCONSIN

OZAUKEE COUNTY

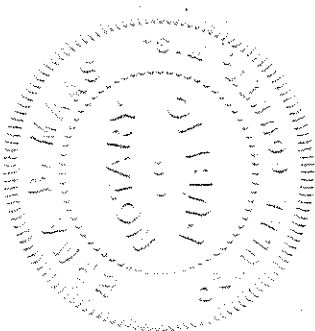
Before me, the undersigned Notary Public, personally appeared Ivan Paul Lusk, who, being duly sworn, deposes and says that he is the treasurer (he) (she) of Cedar Shoe

Company, and, as such, has knowledge of the account between the Cedar Shoe Company and Wesley Parr; that the attached account is a correct statement of account between the Cedar Shoe Company and Wesley Parr, and that there is owing from the said Wesley Parr to the said Cedar Shoe Company the sum of SIX HUNDRED SEVENTY-ONE DOLLARS AND FIFTY-SIX CENTS (\$671.56), with interest from October 22, 1954.

Ivan Paul Lusk
(AFFIANT)

Subscribed and sworn to before me on this the 21st day of September, 1955.

Erna B. Mason
Notary Public My Commission Expires Sept. 1, 1957



SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 WESLEY PARR

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 WESLEY PARR

-----, Defendant.---

by CEDAR SHOE COMPANY, a Corporation

-----, Plaintiff.---

Witness my hand this 26 day of Sept 1955.

Deice J. Newmark, Clerk