

3044

SUMMONS

BOOK 016 PAGE 487

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon JOE B. E. BROWN and JEAN L. BROWN, partners, Individually and doing business as JOE'S SPORT CENTER, 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, Alabama, at Bay Minette, against JOE. B. E. BROWN and JEAN L. BROWN, partners, Individually, and doing business as JOE'S SPORT CENTER by THE SUTCLIFFE COMPANY.

Witness my hand this the 2 day of September, 1956.

Beice J. ...
Clerk of Court

*

THE SUTCLIFFE COMPANY,	)	COMPLAINT
	)	
PLAINTIFF	)	
VS:	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
JOE B. E. BROWN and JEAN L. BROWN, Partners, Individually,	)	
and doing business as JOE'S SPORT CENTER,	)	AT LAW
	)	
DEFENDANT	)	

COUNT I:

The plaintiff claims of the defendants TWO HUNDRED NINETY TWO & 84/100 DOLLARS, (\$292.84), due from them by account on, to wit: the 21st day of September, 1956, which sum of money, with interest thereon is still unpaid.

COUNT II:

The plaintiff claims of the defendants TWO HUNDRED NINETY TWO & 84/100 DOLLARS (\$292.84), due from them on account stated between the plaintiff and the defendants on, to wit: the 21st day of September, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendants TWO HUNDRED NINETY TWO & 84/100 DOLLARS (\$292.84), due from them for merchandise, goods and chattels sold by the plaintiff to the defendants on, to wit: the 21st day of September, 1956, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 21st day of September, 1956.

[Signature]
Attorney for Plaintiff

AFFIDAVIT TO PROVE OPEN ACCOUNT

STATE OF KENTUCKY }
County of JEFFERSON } Sct.

In the matter of account due The Sutcliffe Co., Inc.
from Joe's Sport Center
this day came Paul J. Willenbrink who, being first duly sworn, deposes
and says that he is Treasurer of said creditor which is a (1) Corporation
Under Kentucky Laws and that the account
hereto attached against Joe's Sport Center
for Two Hundred & Ninety Two & ----- .34/100 ¹⁰⁰ Dollars

is a just demand, and has never to his knowledge or belief been paid; and that there is no
offset or discount against the same, or any usury therein.

And this affiant further states that the account herein claimed is due for the articles mentioned
therein, and that the same were sold and delivered by said claimant to the said Debtor
charged. I request and that they promised to pay the sums therein

Subscribed and sworn to before me by Paul J. Willenbrink
this 27 day of Sept 1956 Lawrence Willenbrink
My Commission Expires Notary Public, Jefferson County Ky. My commission expires Feb. 1, 1960
SIGNATURE
NOTARY PUBLIC

(1) If a firm, give full name of other partners. If a corporation, that he is President or Secretary adding on blank line below under the laws of what state it is originated.

BOOK
016
PAGE 438

THE SUTCLIFFE COMPANY

INCORPORATED

WHOLESALE

225-227 SOUTH FOURTH AVENUE

RETAIL

Sporting Goods, Toys, Kodaks and Radios
Norge Products

Louisville 1, Ky. September 111956M. Joe's Sport CenterFoley, Ala.

1955

Sep	17	B	43,758.08
Sep	17	B	43,759.08
Sep	17	B	43,760.03
Sep	17	B	43,761.08
Sep	17	B	43,762.08
Oct	8	B	48,595.03
Oct	21	B	49,212.08
Oct	21	B	49,213.08
Nov	3	L	21,398.08
Dec	13	B	60,928.03

1956

Jun 5 cs

TOTALS

TOTAL CHARGES

LESS CREDITS

BALANCE

59 73

59 44

56 95

29 06

20 49

64

47 03

21 66

4 77

18 07

25 00

25 00

317 84

317 84

25 00

292 84

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. September 17 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center
Foley, Ala.
INVOICE No. B 43758

$\frac{1}{2}$	Dz. 532 MARK MECH TRAIN	27 30	13 65
2	1 $\frac{1}{2}$ GILBERT ERECTOR SET	1 34	2 68
2	3 $\frac{1}{2}$ DITTO	3 34	6 68
2	500 WALKIE TALKIE	1 99	3 98
2	105 DICKY TRACY WRIST RADIO	2 63	5 26
1	1455 SMALL SWITCH BOARD		1 99
3	3 CASH REGISTER	2 00	6 00
1	39 ADDING MACHINE		1 30
2	J271 FRICTION TOYS (BOX OF 10)	80	1 60
1	3058 FIXIT SPORT CONVERT IDEAL		2 00
2	4713 POWER LAUNCH	1 99	3 98
2	4024 TORPEDO BOAT	1 33	2 66
1	4551 STAGE COACH		2 65
2	213-90 FLYING HELICOPTER	2 65	5 30
			59 73

THIS INVOICE SUBJECT TO 5% DISCOUNT IF
PAYMENT IS POSTMARKED ON OR BEFORE

DEC 26, 1955

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. September 17 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center

Foley, Ala.

INVOICE No. B 43759

1	3980 ROY ROGERS RODEO	2 80	2 80
2	4124 ARMY TRAINING	2 85	5 70
4	78 PREP TINKER TOY	67	2 68
2	901x UKELELE	1 00	2 00
2	361 EXPLODING SHIP	1 32	2 64
2	1800 CROSS COUNTRY CANTEN	67	1 34
2	960 DELUXE TRAINING RIFLE	1 99	3 98
1	1100 TABLE TENNIS SET		3 30
1	410S DITTO		2 65
1	Dz. SUTCLIFFE TABLE TENNIS BALLS		75
$\frac{1}{2}$	Dz. F170 FOOTBALL	21 00	10 50
1	1705 BOXING GLOVES		4 00
$\frac{1}{2}$	Dz. 1015 FOOTBALL HELMET	23 40	11 70
3	S18 SHOULDER PADS	1 80	5 40
			59 44

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DEC 26, 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center
Foley, Ala.
INVOICE NO. B 43760

2	T40 VOIT JR. SPORT KIT	1 75	3 50
4	78 BASKETBALLS C/O	2 75	11 00
3	RR3 ROY ROGERS ARCHERY SET	1 77	5 31
1	441 JR. CHAMP ARCHERY SET		3 33
2	Dz. 261 ARROWS 1/20 1/27	3 30	6 60
3	CROWN DOMINOES	57	1 71
3	412 CHECKER BOARDS	57	1 71
3	121 CHINESE CHECKER SETS	67	2 01
3	T100 ELEC TIC TAC TOE	67	2 01
1	500 TRJ ACTION GAME		4 63
2	45 CLUE GAME	2 00	4 00
2	101 POLLYANNA GAME	1 67	3 34
2	350 DOLLAR A SECOND	1 98	3 96
2	1 1/2 GILBERT MAGIC SET	1 97	3 84
			56 95

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PAYMENT IS POSTMARKED ON OR BEFORE DEC 26, 1955

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. September 17 19 55

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center

Foley, Ala.

INVOICE No. B 43761

2	T243 REMOTE CONTROL POLICE CARS	2 17	4 34
2/3	Dz. H200 REVELL 2/205 2/H206 2/207 2/208	60	4 80
1	Dz. DITTO 2/H210 2/H211 2/H212 2/H213 2/H214 2/H215	48	5 76
1/6	Dz. H216 DITTO	60	1 20
1/6	Dz. H302 DITTO	54	1 08
1/6	Dz. H304 DITTO	54	1 08
1/6	Dz. H305 DITTO		78
1/6	Dz. H308 DITTO	54	1 08
2	DITTO 1/H1200 1/H1201	60	2 40
1/6	Dz. REVELL 1/H600 1/H601	60	1 20
1/3	Dz. 1301 INDIAN CRAFT MOCCASIN SET	1 33	2 66
2	467 NAVY PLANE HUBLEY	67	1 34
2	469 LOG TRUCK	67	1 34
			29 06

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DEC. 26, 1955

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DUPLICATE INVOICE

LOUISVILLE 1. KY. September 17 19 55

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1. KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe Sport Center

Foley, Ala.

INVOICE No. B 43762

2	50 HUBLEY FARM SET	1 99	3 98
1	734 CROQUET SET		5 40
2	60 ROAD BUILDING SET	1 33	2 66
3	1 PURCHESI	84	2 52
2	7000 TOOTSIE TOY	1 99	3 98
3	207 DITTO	65	1 95
			20 49

L&N-RAILROAD 9/15/55 ON 8

-BALANCE OF ORDER TO FOLLOW-

THIS INVOICE SUBJECT TO 5% DISCOUNT IF
PAYMENT IS POSTMARKED ON OR BEFORE

DEC 26, 1955

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. October 8 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center

Box 211 Foley, Alabama

INVOICE NO. B 48595

1

#715 CHIN STRAP

60

Postage

04

64

DUPLICATE INVOICE

PHONE CLAY 0283

LOUISVILLE 1, KY. October 21 19 55

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center

Foley, Ala.

INVOICE NO. B 49212

6	1015 BOYS FOOTBALL HELMET WHITE OR RED	23 40	11 70
6	F170 FOOTBALLS	21 00	10 50
4	S18 SHOULDER PADS	1 80	7 20
2	KT300 KICKING TEES	60	1 20
1	ED OF 6 PAL ANGLERS CLIPS		2 70
2	208 SMALL FISHERMANS DELIAR	1 20	2 40
1	2588 TAYLOR WEATHER INSTRUMENT		6 00
1	400 GEIGER COUNTER		2 65
1	H305 REVELL	OUT	
1	H306 DITTO	OUT	
1	H306 DITTO	OUT	
1	H600 DITTO		67
1	H601 DITTO		67
1	H1200 DITTO		67
1	H1201 DITTO		67

47 03

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. October 21 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center
Foley, Ala.
INVOICE NO. B 49213

1	661-102 BATTERY OPERATED JEEP		1	99
2	J243 POLICE CAR	2 17	4	34
2	V18L2 SAFETY DART GAME	60	1	20
2	18683 TWENTY POINT AND TARGET GAME	90	1	80
1	805 GLOBE RACE		3	33
2	67 5 BET YOUR LIFE	1 98	3	96
2	5610 TOOTSIE TOY	1 20	2	40
2	251 RADAR ROCKET SHIP	1 32	2	64
			21	66

-LAST FOUR ITEMS FROM BACK ORDER-

DUPLICATE INVOICE

LOUISVILLE 1, KY. November 3 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

**HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS**

Joe's Sport Center

Foley, Ala.

INVOICE No. L 21398

2	J294 REMOTE CONTROL ROBOT	2	17	4	34
		Postage		43	
	CANCEL- 377 MICROSCOPE			4	77
	H306 REVELL				
	2-468 HOOK & LADDER				

PHONE CLAY 0283

DUPLICATE INVOICE

LOUISVILLE 1, KY. December 13 1955

THE SUTCLIFFE COMPANY

INCORPORATED

225-227 SO. FOURTH STREET LOUISVILLE 1, KY.

HUNTING and FISHING EQUIPMENT — ATHLETIC GOODS
TOYS and GAMES — WHEEL GOODS — KODAKS — GIFT ITEMS

Joe's Sport Center

Foley, Ala.

INVOICE No. B 60928

Order No. 111

1	503 BEN PEARSON BOW 55# PULL
2	441 BEN PEARSON JR CHAMP ARCH SETS
3	PR-3 ROY ROGERS ARCHERY SETS
1	811 ARM GUARD
1	802 SHOOTING GLOVE
2	631 BOW STRINGS
2	636 DITTO
1	SR-1511 FOOTBALL BLADDER
2	25 DAISY PUMP AIR RIFLE
2	102 DAISY CUB AIR RIFLE
2	J294 REMOTE CONTROL ROBOT
2	J243 DITTO POLICE CAR
2	469 HUBLEY LOG TRUCK

CANCEL OUT
CANCEL OUT

CANCEL OUT

21

CANCEL

3 00

OUT CANCEL

OUT CANCEL

67

6 00

1 50

75

42

80

6 00

1 34

16 81

1 26

18 07

Postage

Served 2 day of Oct 19 56
at 11 day of Oct 1956
served a copy of the within L+C
Joe B. Brown &
Jean L. Brown
by service on _____

TAYLOR WILKINS, Sheriff
By Mark L. Brown D. S.

Foley = (2) 144 mi.
The Sheriff claims
144 mi. @ 10 per mi.
1440

3044

SUMMONS AND COMPLAINT

THE SUTCLIFFE COMPANY,
PLAINTIFF

VS:

JOE B. E. BROWN AND JEAN L.
BROWN, PARTNERS, INDIVID
UALLY AND DOING BUSINESS AS
JOE'S SPORT CENTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
OCT 2 1956
ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA