

LAW OFFICES  
E. G. RICKARBY  
BANK BUILDING  
FAIRHOPE, ALABAMA  
May 27, 1957

P. O. BOX 71

3049


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

Dear Mrs. Duck:

Inre: K. Van Bourgondien & Sons  
Vs: Dutchland Farms  
Our File: 3671

In this case we issued a Summons against the defendant and the sheriff returned it "Not Found". I have been informed that he is down in Foley now so, please issue an alias and send it down to the sheriff with the enclosed letter.

Yours very truly,



EGR/ts  
Encl.  
6-6-57

K. VAN BOURGONDIE &  
SONS, INC.,  
a corporation  
Plaintiff

vs.

DUTCHLAND FARMS,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

DEMUR

Comes now Ted Verdonshot, by his attorney, appearing specially and only for the purpose of filing this plea, and says that the said K. Van Bourgondien & Sons, Inc., plaintiff in this cause, ought not to have and maintained its said action for the said Ted Verdonshot says, separately and severally, as follows, to-wit:

FIRST

That his name is Ted Verdonshot; that he was served with a copy of the summons and complaint in the above styled cause.

SECOND

That the said bill of complaint fails to set forth in what capacity the defendant, Dutchland Farms, is being sued.

THIRD

That there is no corporation, or individual, under the name of or using the name of "Dutchland Farms".

Wherefore, the said Ted Verdonshot says that this suit should be abated, and should not be allowed to proceed.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Before me, James A. Bini, a Notary Public in and for said County, in said State, personally appeared Ted Verdonshot, who being duly sworn, deposes and says that his name is Ted Verdonshot; that he is cognizant of the facts set forth in the above and foregoing plea in abatement, and that said facts are true and correct.

Sworn to and subscribed before me this 27 day of June, 1957.

James A. Bini  
Notary Public, Baldwin County, Alabama

FILED

JUN 29 1957

ALICE L. DUCK, Clerk

LAW OFFICES

E. G. RICKARBY

BANK BUILDING

FAIRHOPE, ALABAMA

October 5, 1956

TELEPHONE WA 8-9836

TELE

P. O. BOX 71

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

Dear Mrs. Duck:

In Re: K. Van Bourgonien & Sons  
vs.  
Dutchland Farms  
Our File No. 3671

With this we are handing you summons and complaint in the  
above styled cause, together with itemized and verified  
statement and our check for \$20.00 deposit for costs.

Please process and oblige.

Yours very truly,



EGR/rl  
c/c Dupl. Dun & Bradstreet  
Encl.  
10-30-56

K. VAN BOURGONDIEEN & SONS, INC., )  
A Corporation, )

PLAINTIFF )

VS. )

DUTCHLAND FARMS, )

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 ONE THOUSAND ONE HUNDRED THIRTY ONE DOLLARS AND SIX CENTS (\$1,131.06) due from him by account on the 1st day of January, 1954, which sum of money with interest thereon is still unpaid.

COUNT II.


The Plaintiff claims of the Defendant ONE THOUSAND ONE HUNDRED THIRTY ONE DOLLARS AND SIX CENTS (\$1,131.06) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit; the 1st day of January, 1954, which sum of money with interest thereon is still unpaid.

COUNT III.

The Plaintiff claims of the Defendant ONE THOUSAND ONE HUNDRED THIRTY ONE DOLLARS AND SIX CENTS (\$1,131.06) due from him by account between the Plaintiff and the Defendant on, to-wit, the 1st day of January, 1954, which sum of money with interest thereon, is still unpaid.

  
E. G. RICKARBY  
Attorney for Plaintiff

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

  
E. G. RICKARBY  
Attorney for Plaintiff

## INVOICE

K. VAN BOURGONDIE &amp; SONS, INC.

WHOLESALE BULB GROWERS

P. O. BOX 5

BABYLON, N. Y.

BRANCH OFFICE AT  
HILLEGOM, HOLLANDTELEPHONE  
BABYLON 264Sold  
ToDutchland Farms,  
Foley, Alabama.

Date September 23, 1953.

ORDER NO. 2482	DATE SHIPPED Sept. 8, 1953	SHIPPED VIA	PACKED IN 1 case	TERMS 2% ten days - 30 Net	
QUANTITY	DESCRIPTION			UNIT PRICE	TOTAL
500	King Alfred	DN I	Case # 3810	\$70.	\$35.00
2000	Ixia in 10 varieties			16.	32.00
AMOUNT DUE					\$67.00

"BETTER BLOOMS FROM BETTER BULBS."

UARC INC., DEEP RIVER, CONN.

## INVOICE

## K. VAN BOURGONDIE &amp; SONS, INC.

WHOLESALE BULB GROWERS

P. O. BOX 5

BABYLON, N. Y.

BRANCH OFFICE AT  
HILLEGOM, HOLLANDTELEPHONE  
BABYLON 264Sold  
ToDutchland Farms,  
Foley, Alabama.

Date October 10, 1952.

ORDER NO.	DATE SHIPPED	SHIPPED VIA	PACKED IN	TERMS
2312				2% ten days - 30 Net
QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL
<u>Case No.</u>				
391/94 17000	Golden Harvest	( 4 cases of 4250) 7-8	\$8.00	\$136.00
395/96 8000	" "	( 2 cases of 4000) 7-8	8.00	64.00
397/406 18000	Wedgewood	(10 cases of 1800) 9-10	12.00	216.00
407/10 7000	"	( 4 cases of 1750) 9-10	12.00	84.00
411/22 46800	Imperator	(12 cases of 3900) 7-8	7.50	351.00
423 3200	"	7-8	7.50	24.00
				<hr/>
				\$875.00

"BETTER BLOOMS FROM BETTER BULBS."

VARCO INC., DEEP RIVER, CONN.

## INVOICE

K. VAN BOURGONDIE & SONS, INC.  
 WHOLESALE BULB GROWERS  
 P. O. BOX 5 BABYLON, N. Y.

TELEPHONE  
 BABYLON 264

BRANCH OFFICE AT  
 HILLEGOM, HOLLAND

Sold  
 To

Dutchland Farms,  
 Foley, Alabama.

Date 1-6-53.

ORDER NO. 2350	DATE SHIPPED	SHIPPED VIA	PACKED IN 22 Cases.	TERMS 2% ten days - 30 Net
QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL
Case #				
31/37 42000 38 8000	Hopman's Glory (7 cases of 6000) 6-8 " "		\$7.10	\$355.00
39/45 42000 46 8000	Picardy (7cases of 6000) 6-8 " "		\$7.00	\$350.00
47/51 30000 52 9000	Spotlight (5 cases of 6000) " "		\$6.50	\$253.50
	Heating Insurance			\$958.50
	Total			38.34
				\$996.84

"BETTER BLOOMS FROM BETTER BULBS."

VARCO INC., DEEP RIVER, CONN.

STATE OF NEW YORK,  
SUFFOLK COUNTY.

Before me, the undersigned Notary Public, personally appeared P. C. Van Bourgondien, who being duly sworn, deposes and says that he is President K. VAN BOURGONDIEN & SONS, the owner of the attached account, and that the attached account is a correct statement of account between K. VAN BOURGONDIEN and DUTCHLAND FARMS, and that there is owing from the said DUTCHLAND FARMS to the said K. VAN BOURGONDIEN & SONS the sum of \$1131.06 (\$ \_\_\_\_\_), with interest from 1/1/54.

P. C. Van Bourgondien Pres  
AFFIANT

Subscribed and sworn to before me on this the 1<sup>st</sup> day of October, 1956.

Guilford C. Abbott  
Notary Public

GUILFORD C. ABBOTT  
Notary Public, State of New York  
Appointed and residing in Suffolk County  
Suffolk County Clerk's No. 52-5001800  
Term Expires March 30, 1958

SUMMONS AND COMPLAINT

Baldwin Times

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 DUTCHLAND FARMS

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 \_\_\_\_\_

DUTCHLAND FARMS

Defendant .....

by K. VAN BOURGONDIE & SONS, INC., A Corporation

Plaintiff.....

Witness my hand this

8

day of

OCT

1956

Allice J. Hensley Clerk