

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW - CASE NO. 3054

INTERROGATORIES

Comes now the plaintiff in the above styled cause and propounds the following interrogatories to the defendant:

1. State whether or not you have made purchases from the plaintiff.

2. Isn't it true that on February 6, 1956 you executed check No. 3147 to the American Pharmaceutical Company in the amount of \$189.15, drawn on the Central Baldwin Bank, Robertsdale, Alabama?

3. Isn't it true that this check was returned marked "insufficient funds"?

4. Isn't it true that on February 25, 1956 you executed check No. 3148, drawn on the Central Baldwin Bank, Robertsdale, Alabama, in the amount of \$200.00 to the American Pharmaceutical Company?

5. Isn't it true that this check was returned marked "insufficient funds"?

6. Isn't it true that on March 15, 1956 you executed check No. 3149, drawn on the Central Baldwin Bank, Robertsdale, Alabama, in the amount of \$200.00 to the American Pharmaceutical Company?


7. Isn't it true that this check was returned marked "insufficient funds"?

8. Isn't it true that these three checks returned because of insufficient funds total \$589.15?


9. Is it not a fact that you still owe the sum of \$589.15 to the Plaintiff?

Attorney for Plaintiff

I, Forest A. Christian, Attorney for Plaintiff in the above styled cause, hereby certify that the answers to the above and foregoing interrogatories, if well and truly made, will be material evidence for the Plaintiff on the trial of this cause.


Forest A. Christian

Subscribed and sworn to before me
on this the 7th day of November, 1956.


Notary Public
Baldwin County, Alabama

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon MACON DRUG STORE, INC., 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 MACON DRUG STORE, INC., by AMERICAN PHARMACEUTICAL COMPANY.

Witness my hand this the 9 day of October, 1956.

David J. Hester
Clerk

COMPLAINT

AMERICAN PHARMACEUTICAL)
COMPANY,)

PLAINTIFF)

VS:)

MACON DRUG STORE, INC.,)

DEFENDANT)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant FIVE HUNDRED EIGHTY NINE & 15/100 DOLLARS (\$589.15), due from it by account on, to wit: the 30th day of April, 1956, which sum of money, with interest thereon is still unpaid.

COUNT II:

The plaintiff claims of the defendant FIVE HUNDRED EIGHTY NINE & 15/100 DOLLARS (\$589.15), due from it on account stated between the plaintiff and the defendant on, to wit: the 30th day of April, 1956, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant FIVE HUNDRED EIGHTY NINE & 15/100 DOLLARS (\$598.15), due from it for merchandise, goods' and chattels sold by the plaintiff to the defendant on, to wit: the 30th day of April, 1956, which sum of money, with interest thereon, is still unpaid.

James A. Hester
Attorney for Plaintiff

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 24th day of September, 1956.

James A. Hester

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

Richard A. Garrett
 being duly sworn, doth depose and say, that he is *Controller* of *American*
 American Pharmaceutical Company that the annexed statement of the account of
 Macon's Drug Store, Inc.

lately doing business at Robertsdale
 in the State of Alabama is just, true and correct, that there is now due
 the sum of Five hundred eighty-nine and 15/100----- Dollars,
 plus interest to date.
 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.

X *Richard A. Garrett*

Sworn to before me, this 24
 day of Sept, 1956 NP

Emily Newman
 EMILY NEWMAN
 Notary Public, State of New York
 No. 31-2879250
 Qualified in New York County
 Certs. filed with N. Y. Co. Clk. & Reg.
 Commission Expires March 30, 1957

served a copy of this
on Macon Drug Store Inc.
E. J. C.
By service on _____

TAYLOR WILKINS, Sheriff
By Ed Leigh Stallard

Robertsdale Ala

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Stallard
DEPUTY SHERIFF

11503
11504

70. 3054

SUMMONS AND COMPLAINT

AMERICAN PHARMACEUTICAL COMPANY,

PLAINTIFF

VS: "

MACON DRUG STORE, INC.

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED
OCT 9 1956
J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

AMERICAN PHARMACEUTICAL COMPANY,

PLAINTIFF

VS

MACON DRUG STORE, INC.

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and for answer to the Interrogatories filed by the Plaintiff says:

1.

The Defendant objects to this question as being too general and not limited to a reasonable time.

2.

The Defendant objects to the question on the grounds that it is immaterial irrelevant and incompetent.

3.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

4.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

5.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

6.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

7.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

8.

The Defendant objects to the question on the grounds that it is immaterial, irrelevant and incompetent.

9.

The Defendant objects to this question as it is the issue to be decided in this cause.

William C. Macon
William C. Macon

STATE OF ALABAMA

BALDWIN COUNTY

Before me Harry J. Wilters, Jr., a Notary Public, in and for the State of Alabama at Large, personally appeared before me William C. Macon, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath, as follows: That his name is William C. Macon and he signed his name to the foregoing answers to interrogatories and that he has read over said interrogatories and that the answers thereto are true and correct.

William C. Macon

Sworn to and subscribed before me this 7 day of January, 1957.

Harry J. Wilters, Jr.
Notary Public,

AMERICAN PHARMACEUTICAL
COMPANY

PLAINTIFF

VS

MACON DRUG STORE, INC.

DEFENDANT

Q

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 3054

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

1.

Not guilty.

Wilters & Brantley

BY:

Ray J. Wilters
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY:

Ray J. Wilters
Attorneys for the Defendant