CHINCHILLA FARMS OF NEW JERSEY, A Corporation,

Plaintiff

VS.

H. E. JONES,

Defendant

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

AT LAW

# COMPLAINT

### COUNT I

The Plaintiff claims of the Defendant TWO HUNDRED AND EIGHTY-ONE DOLLARS AND SIXTY-FOUR CENTS (\$281.64) due from him by account on, to-wit, the 1st day of January, 1955; which sum of money with the interest thereon is still unpaid.

### COUNT II

The Plaintiff claims of the Defendant TWO HUNDRED AND EIGHTY-ONE DOLLARS AND SIXTY-FOUR CENTS (\$281.64) due from him on accounts stated between the Plaintiff and Defendant on, to-wit, the 1st day of January, 1955; which sum of money, with the interest thereon, is still unpaid.

## COUNT III

The Plaintiff claims of the Defendant TWO HUNDRED AND EIGHTY-ONE DOLLARS AND SIXTY-FOUR CENTS (\$281.64) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 1st day of January, 1955; which sum of money, with the interest thereon, is still unpaid.

28162 2521 881 30685 9

E. G. RICKARBY, Attorney for the Plaintiff

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

E. G. RICKARBY,

Attorney for the Plaintiff

TELEPHONE WA 8-9836

#### E. G. RICKARBY

BANK BUILDING FAIRHOPE, ALABAMA March 19, 1957

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

Dear Mrs. Duck:

Re: Chinchilla Farms of N.J.

Vs: Dr. H. E. Jones Our File: 4007

In this case, you will find Summons and Complaint, and an itemized and verified statement of account, along with deposit for costs, in the sum of \$20.00.

Please process and oblige.

Yours very truly,

EGR/ts Encl. 3-29-57

cc: (dup) Dun & Bradstreet, Inc.

Plan send us some more Idassomons & conflaint form we are fush out,

# STATE OF New Jersey

| Be it remembered, that on this 13th day of March   |
|--|
| A D 1027 paragraph appropriate before me the understand out beginning.   |
| A. D., 1957, personally appeared before me, the undersigned authority.   |
| Mown to me   |
| Charles R. Williams known to me who being duly sworn, upon his oath stated that he is President of Chinchilla Farms of New Setsethat he is                                   |
| (a corporation organized and doing business under the laws of the State of New Jersey  |
| and has been duly authorized by said corporation to make this affidavit  |
| (a partnership composed of   |
|  |
| a sole trader doing business as  |
| and that as such he makes this efficient that he is familiar with the health and having a  |
| and that as such he makes this affidavit; that he is familiar with the books and business of said COPPOTATION : that the attached account against                            |
| said <u>corporation</u> ; that the attached account against <u>Dr. H. E. Jones</u> of <u>Robertsdale</u> , <u>Alabama</u>  |
|  |
| is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  |
| posing the said account were sold and delivered to said party  |
| AUS.   |
| at { there) special instance and request, that credit has been duly given for all payments and   |
| ( his )  |
| just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of Two Hundred Eighty One and 64/100 Dollars |
| thereof, amounting to the sum of TWO HUNGTED ELECTIVE One and 04/100 Dollars   |
| (\$ 281.64 ) with interest from January 1 1955 is justly due and   |
| remains unpaid.  |
| remains unpaid.  |

I hereby certify under my official seal that I am authorized as a Notary Public to administer oaths under the laws of the State of the

To cother my O eg Notary Public

County of My commission expires.

A. D. 19.

NOTARY PUBLIC OF N. J. My Commission Expired Cot. 20

My Commission Expires Oct. 28, 1959

### INVOICE

# Chinchilla Farms of New Jersey

CHINCHILLA CAGES

**SCALES** 

Route 22, Cor. Mountain Parkway

GERMICIDAL

BOUND BROOK, N. J.

EQUIPMENT

Telephone DUnellen 2-2830

10/15/54

SUPPLIES AIR CONDITIONING UNITS

CHINCHILLA

**FEEDS** 

Dr. H. E. Jones TO:

234 Phyllis Drive Lindenhurst, N. Y.

5 Empty shipping crates

THANK YOU

# INVOICE #1266

# Chinchilla Farms of New Jersey

CHINCHILLA CAGES

GERMICIDAL EQUIPMENT

**SCALES** 

TO:

Route 22, Cor. Mountain Parkway

Telephone DUnellen 2-2830

BOUND BROOK, N. J.

234 Phyllis Drive Lindenhurst, N. Y.

Pks. Dinner Napkins

Pks. Cocktail Napkins

THANK YOU

Parcel Post Charges - None - our error

9/19/54

@ \$.75

FEEDS

\$ 1.50

\$ 2.60

AIR CONDITIONING

**UNITS** 

SUPPLIES

# CHINCHILLA

#### Invoice # 1467

# Chinchilla Farms of New Jersey

CHINCHILLA Route 22, Cor. Mountain Parkway **CAGES** 

SUPPLIES AIR CONDITIONING

**CHINCHILLA** 

GERMICIDAL

BOUND BROOK, N. J.

UNITS

EQUIPMENT

**FEEDS** 

SCALES

Telephone DUnellen 2-2830

Dr. H. E. Jones

10/7/54

TO: 234 Phyllis Drive

Carl Gates Shipped to: Robertsdale, Ala.

Lindenhurst, N. Y.

EE136D Pens

@ \$ 32.36

\$ 194.16

60 3.60

6 L. E. water Units

Nest boxes (3 L. H. and 3 R. H.)

52.08 8.68

Dust baths

1.65

9.90

9.30

9.30

\$ 269.04

E36 Stand

THANK YOU

| SUPPONS AN            | ID COMPLAINT                                      |   |          |                           | i tu    | 177              |                |
|-----------------------|---|---|----------|---------------------------|---------|------------------|----------------|
| THE STATE             | OF ALABAMA,                                       | )<br>No.  |          | Circuit                   | Court   | , Bald           | lwin           |
| Baldwin               | County.   | ;   | - 1      |                           |         |                  |                |
|                       |   |   | ;        | jump v<br>jump v<br>strat |         | TERM,            | . 19           |
|                       | en<br>San   |   | .:       |                           | 3       | <del>-</del>     |                |
| TO ANY SHE            | RIFF OF THE                                       | STATE OF ALABAM   | : AN     | ja ja                     |         |                  | 7 S            |
| Von Ame He            |   |   | #*<br>   |                           |         |                  | <u>0</u>       |
| TOU ALE HE            | reby command                                      | ed to Summon _  | : :      | H. E.                     | JONES   | \$               |                |
|                       |   |   | <u> </u> |                           | \$ at   |                  |                |
|                       |   |   |          | :                         | Sec. 4  | 2                |                |
|                       |   |   |          | - S                       | ners;   |                  |                |
| to appear             | and plead, a                                      | nswer or demur,   | , with   | in thir                   | ty day  | s from           | th             |
|                       |   | nswer or demur,   |          |                           |         |                  |                |
| service he            | reof, to the                                      | complaint file  | ed in    | the Cir                   | cuit: C |                  |                |
| service he            | reof, to the                                      | complaint file  | ed in    | the Cir                   | cuit: C | ourt o           | of B           |
| service he            | reof, to the ate of Alaban                        | complaint file  | ette,    | the Cir                   | cuit. C | ourt o           | f B            |
| service he            | reof, to the ate of Alaban                        | complaint file  | ette,    | the Cir                   | cuit. C | ourt o           | of B           |
| service he            | reof, to the ate of Alaban                        | complaint file<br>ma, at Bay Mine<br>,<br>FARMS OF NEW JE | ette,    | the Ciragainst            | cuit C  | ourt o  DEFE  n, | f B            |
| service he County, St | reof, to the ate of Alaban                        | complaint file<br>ma, at Bay Mine<br>,<br>FARMS OF NEW JE | ette,    | the Ciragainst            | cuit C  | ourt o  DEFE  n, | f B            |
| service he County, St | reof, to the ate of Alabar H. E. JONES CHINCHILLA | complaint file<br>ma, at Bay Mine<br>,<br>FARMS OF NEW JE | ette,    | the Cir                   | cuit C  | ourt o  DEFE  n, | of<br>NI<br>IF |
| service he County, St | reof, to the ate of Alabar H. E. JONES CHINCHILLA | complaint file<br>ma, at Bay Mine<br>,<br>FARMS OF NEW JE | ette,    | the Ciragainst            | oratio  | ourt o  DEFE  n, | NDA            |

1

[ [22]