

LAW OFFICES  
E. G. RICKARBY  
BANK BUILDING  
FAIRHOPE, ALABAMA

July 23, 1957

3295

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

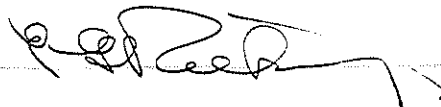
Dear Mrs. Duck:

In Re: Reese Chemical Co.  
vs.  
Julian Bristow, etc.  
Our File No. 3963

With this we are handing you Summons and Complaint in the above mentioned matter, together with itemized and verified statement, and our check in the sum of \$15.00 for deposit for cost.

Please process and oblige.

Yours very truly,



rl  
c/c Dupl. client  
Encl.

I wrote client and told them to make a \$20.00 deposit for cost and they only sent \$15.00. Will this cover? Remember we won't have any Sheriff's milage to amount to any thing as Mr. Bristow lives in Bay Minette,

EGR/rl

REESE CHEMICAL COMPANY,  
INC., A CORPORATION,

PLAINTIFF

VS

JULIAN BRISTOW, individually  
and d/b/a Bristow Prescription  
Drug Store,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2395

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

1.

Not guilty.

2.

That he does not owe the amount sued for nor any amount.

*Filed June 18, 1958*  
*Alice J. Luck*  
*clerk*

Wilters & Brantley

BY:

*William M Brantley*  
Attorneys for the Defendant

REESE CHEMICAL COMPANY, INC.,  
A Corporation,

PLAINTIFF,

-VS-

JULIAN BRISTOW, Individually  
and doing business as  
BRISTOW'S PRESCRIPTION DRUG  
STORE,

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

A M E N D E D C O M P L A I N T

Comes the Plaintiff in the above styled cause and moves  
to amend his Complaint by adding Count IV, Count V and Count VI  
as follows:

COUNT IV

The Plaintiff claims of the Defendant TWO HUNDRED AND  
FORTY-FIVE DOLLARS AND EIGHTY-FIVE CENTS (\$245.85) due from him by  
account on, to-wit, the 12th day of October, 1955; which sum of money  
with interest thereon is still unpaid.

Since the itemized and verified statement was prepared in  
this case, the Defendant has paid TEN DOLLARS (\$10.00) on this account.

COUNT V

The Plaintiff claims of the Defendant TWO HUNDRED AND FORTY-  
FIVE DOLLARS AND EIGHTY-FIVE CENTS (\$245.85) due from him for merchandise,  
goods and chattels sold by the Plaintiff to the Defendant on, to-wit,  
the 12th day of September, 1955; which sum of money with the interest  
thereon is still unpaid.

Since the itemized and verified statement was prepared in  
this case, the Defendant has paid TEN DOLLARS (\$10.00) on this account.

COUNT VI

The Plaintiff claims of the Defendant TWO HUNDRED AND FORTY-  
FIVE DOLLARS AND EIGHTY-FIVE CENTS (\$245.85) due from him on accounts  
stated between the Plaintiff and the Defendant on, to-wit, the 12th  
day of October, 1955; which sum of money with interest thereon is  
still unpaid.

Since the itemized and verified statement was prepared in  
this case, the Defendant has paid TEN DOLLARS (\$10.00) on this account.

*Filed  
Feb. 25, 1958  
Alice J. Luck  
Clerk*

139

*E. G. Rickarby*  
E. G. Rickarby,  
Attorney for the Plaintiff

REESE CHEMICAL COMPANY, INC.,  
A Corporation,

PLAINTIFF

-VS-

JULIAN BRISTOW, Individually  
and Doing Business As  
BRISTOW'S PRESCRIPTION DRUG  
STORE,

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 TWO HUNDRED FORTY SEVEN DOLLARS AND FIVE CENTS (\$247.05) due from him by account on, to-wit the 12th day of October, 1955; which sum of money with interest thereon is still unpaid.

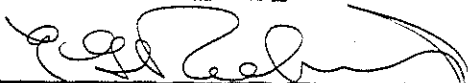
COUNT II

The Plaintiff claims of the Defendant TWO HUNDRED FORTY SEVEN DOLLARS AND FIVE CENTS (\$247.05) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 12th day of September, 1955; which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant TWO HUNDRED FORTY SEVEN DOLLARS AND FIVE CENTS (\$247.05) due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 12th day of October, 1955; which sum of money with interest thereon is still unpaid.

E. G. RICKARBY

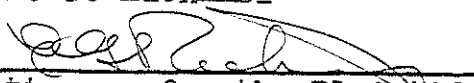
  
Attorney for the Plaintiff

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

*Filed  
July 25, 1957*

*Executed July 26, 1957*

E. G. RICKARBY

  
Attorney for the Plaintiff

IMPORTANT: Read over slowly. Fill out very carefully. Attach itemized statement in triplicate showing each debit and credit supported by triplicate invoices of each debit. Do not strike out, change or add to except where indicated.

STATE OF Ohio

COUNTY OF Cuyahoga

Before me, the undersigned authority, on this day personally appeared George W. Reese, Jr.,  
known to me, who being duly sworn, upon oath deposes and says that he is Treasurer  
and duly authorized agent of The Reese Chemical Company  
(Position held)

The Reese Chemical Company

(Trade name or name of company)

A corporation duly incorporated and existing under the laws of the State of Ohio  
a partnership consisting of \_\_\_\_\_

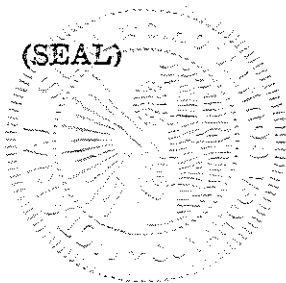
Owned and operated by \_\_\_\_\_, a sole trader,  
residing in the County of \_\_\_\_\_, State of \_\_\_\_\_, and that as  
such he makes this affidavit: that he is familiar with the books of said corporation, partnership, or Sole

Trader; that the attached account against Bristow's Prescription Drug Store (Leave only one), constituting this  
cause of action, is taken from original books of entry, and is just and true within the knowledge of this  
affiant; that all just and lawful offsets, payments and credits have been allowed and that the sum of  
Two hundred fifty-five & 85¢ Dollars (\$ 255.85), with interest  
thereon at the legal rate from the 1st day of January next following the date or dates thereof is due,  
owing and unpaid.

George W. Reese, Jr.  
(Affiant)

Subscribed and sworn to before me this 10th day of January A. D. 19 56.

(SEAL)



135

Margaret Wem M. Wem  
Notary Public in and for the County and State first  
hereinbefore written.

My commission expires 4-12-57 A. D. 19 \_\_\_\_\_

Margaret Wem

Notary must PRINT name hereon.



# THE REESE CHEMICAL CO.

10617 FRANK AVENUE, S. E.

CLEVELAND 6, OHIO

DATE 9-12-55

TERMS: 1% 10 DAYS NET 30 DAYS  
NO MERCHANDISE CONSIGNED

SOLD TO Bristow's Pres Drug Store,  
Bay Minette, Ala.

CUSTOMER'S  
ORDER No.

PREPAID VIA NYC

SALESMAN Lyons

QUANTITY	PRODUCTS	FAIR TRADE PRICE	DOZEN PRICE	BONUS GOODS	CREDITS	DEBITS
	Dozen Thoxine, Small	\$ .45	\$ 3.00			
	Dozen Thoxine, Medium	.75	5.40			
	Dozen Thoxine, Large	1.25	9.00			
	Doz. Doughboy Prophylactic ( Navy Formula 1 Tube )	.35	1.50			
	Doz. Doughboy Proph. 5's		7.50			
	Doz. Doughboy Proph. Kits ( Army Formula 2 Tubes )	.50	2.40			
	Doz. Doughboy Proph. Kits 3's		7.20			
	Dozen Red Heart Tablets	2.00	16.00			
	Dozen Red Heart Tablets Spec. Formula	3.00	21.00			
	Dozen Reese's Blu-Tabs 36's	1.00	8.00			
	Dozen Reestora Tablets	3.00	21.00			
	Dozen Recalsan Tablets	2.00	10.80			
	Dozen Rehisco Tablets					
4	Dozen Throat Lozenges		3.60			14 40
	Dozen Codeine Throat Lozenges					
	Dozen Rheumatic Tablets					
	Dozen Diuretic Pills					
	Dozen Cold Capsules					
	Dozen Cold Capsules #1					
	Dozen Super Cold Capsulets					
	Dozen Children's Cold Wafers					
	Dozen Cough Syrup					
3	Dozen Codeine Cough Syrup		7.15			21 45
	Dozen Rectal Ointment					
	Dozen Sedative Tablets					
	Dozen Sedative Capsules					
	Dozen Anti-Histamine + A.P.C.					
	Dozen Anti-Hist. + A.P.C. + C + Cod.					
	Dozen Asthma Relief Tablets					
	Dozen Menstrual Pain Capsules					
	Dozen Appetite Appeasement Wafers					
	Dozen Special Formula Tablets					
	Dozen Anti-Smoke Tablets					
	Dozen Stay-Awake Tablets					
	Dozen Laxative Tablets					
	Dozen Skin Irritation Ointment					
	Dozen Headache & Neuralgia Capsulets					
	Dozen Hematinic Liquid					
	Dozen Geriatric Liquid					
	Dozen Nasal Spray					
12x72	Repaba Capsulets		13.80			13 80
12x100	H. P. Multi-Vitamins—1-A-Day		24.00			24 00
	H. P. Multi-Vitamins—Children's					
3x100	Liver, Iron, B <sub>1</sub> -B <sub>2</sub> -B <sub>12</sub> , Folic, Stom. Pow.		18.00			4 50
6x100	Therapeutic Multi-Vitamins		42.00			21 00
	B Complex Vitamins					
	Multi-Vitamins					
	Stress Vitamin Formula					
	Vitamin & Mineral Capsules					
36x32	Special Formula Tablets		4.80			14 40
	Dealer helps					
	137					
NET AMOUNT →						113 55

WE, THE UNDERSIGNED, DO HEREBY GUARANTEE THAT THE PRODUCTS LISTED HEREIN ARE NOT ADULTERATED OR MISBRANDED WITHIN THE MEANING OF THE FEDERAL FOOD DRUGS AND COSMETIC ACT OF 1938 (S-S), AND AS AMENDED, INCLUDING #404 AND #505 COVERING INTERSTATE COMMERCE.

THE REESE CHEMICAL CO., CLEVELAND, OHIO

NOTE: No merchandise may be returned without written authorization.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. \_\_\_\_\_

TERM, 1957

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JULIAN BRISTOW

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 Julian Bristow, Indi-  
vidually and d/b/a Bristow's Prescription Drug Store-----, Defendant.

by REESE CHEMICAL COMPANY, INC., A CORPORATION-----

-----, Plaintiff

Witness my hand this

25

day of

July

1957

138

-----, Clerk



REESE CHEMICAL COMPANY, INC.,  
A Corporation

PLAINTIFF

VS

JULIAN BRISTOW, Individually  
and d/b/a BRISTOW'S PRESCRIPTION  
DRUG STORE

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

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

1.

That it does not state a cause of action.

2.

That the amount sued for in Count one, two and three differs from the amount shown in the itemized and verified statement.

Wilters & Brantley

BY: Harry J. Wilters  
Attorney for Defendant

Defendant demands a trial by jury.

Wilters & Brantley

BY: Harry J. Wilters  
Attorney for Defendant

Filed  
Aug 27, 1957