

E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA

July 22, 1957

3296

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

Dear Mrs. Duck:

In Re: Kingsley Stamping Machine Co.
vs.
Julian Bristow, etc.
Our File No. 3901

In the above mentioned matter, we are herewith handing you
Summons and Complainant, itemized and verified statement of
account and our check in the sum of \$12.50 for deposit for
cost.

Please process and oblige.

Yours very truly,



EGR/rl
c/c Dupl. client

I wrote client and told them to make a \$15.00 deposit for cost
and they only sent \$12.50. 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

KINGSLEY STAPLING MACHINE
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

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

1.

Not guilty.

2.

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

Wilters & Brantley

BY: Salter M Brantley
Attorneys for the Defendant.

Filed Jan. 15, 1958

KINGSLEY STAMPING MACHINE COMPANY,
INC., A Corporation,

PLAINTIFF,

-VS-

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

DEFENDANT.

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

AMENDED COMPLAINT

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 ONE HUNDRED AND TWELVE DOLLARS AND THIRTY-SEVEN CENTS (\$112.37) due from him by account on, to-wit, the 21st day of November, 1955; which sum of money with interest thereon is still unpaid.

Since said account was verified, the Defendant paid TEN DOLLARS (\$10.00) on said claim.


COUNT V

The Plaintiff claims of the Defendant ONE HUNDRED AND TWELVE DOLLARS AND THIRTY-SEVEN CENTS (\$112.37) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 21st day of October, 1955; which sum of money with the interest thereon is still unpaid. Since said account was verified, the Defendant paid TEN DOLLARS (\$10.00) on said claim.

COUNT VI

The Plaintiff claims of the Defendant ONE HUNDRED AND TWELVE DOLLARS AND THIRTY-SEVEN CENTS (\$112.37) due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 21st day of November, 1955; which sum of money with interest thereon is still unpaid. Since said account was verified, the Defendant paid TEN DOLLARS (\$10.00) on said claim.

Filed Feb. 25, 1958


E. G. RICKARBY,
Attorney for the Plaintiff.

KINGSLEY STAMPING MACHINE CO.,
INC., A CORPORATION,

PLAINTIFF

-VS-

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

DEFENDANT

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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 HUNDRED THIRTEEN DOLLARS AND FIFTY SEVEN CENTS (\$113.57) due from him by account on, to-wit, the 21st day of November, 1955; which sum of money with interest thereon is still unpaid.


COUNT II

The Plaintiff claims of the Defendant ONE HUNDRED THIRTEEN DOLLARS AND FIFTY SEVEN CENTS (\$113.57) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 21st day of October, 1955; which sum of money with the interest thereon is still unpaid.

COUNT III


The Plaintiff claims of the Defendant ONE HUNDRED THIRTEEN DOLLARS AND FIFTY SEVEN CENTS (\$113.57) due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 21st day of November, 1955; which sum of money with interest thereon is sill 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 E. G. RICKARBY
Executed 7-25-57 

Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 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,

Individually and Doing Business as Bristow's Pres. Drug Store defendant.

by KINGSLEY STAMPING MACHINE CO., INC., A CORPORATION

..... Plaintiff

Witness my hand this day of 19.....

Alice J. [Signature] Clerk

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 California

COUNTY OF Los Angeles

Before me, the undersigned authority, on this day personally appeared F R Vickers,
known to me, who being duly sworn, upon oath deposes and says that he is Secretary
and duly authorized agent of _____
(Position held)

Kingsley Stamping Machine Co
(Trade name or name of company)

A corporation duly incorporated and existing under the laws of the State of California
a partnership consisting of _____

Owned and operated by _____, a sole trader,
residing in the County of Los Angeles, State of California, and that as
such he makes this affidavit: that he is familiar with the books of said corporation, partnership, or Sole
(Leave only one)

Trader; that the attached account against Bristow Drug Co, 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
One Hundred Twenty Two and 37/100 Dollars (\$ 122.37), 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.

F R Vickers
(Affiant)

Subscribed and sworn to before me this 4 day of December A. D. 19 56

(SEAL)

142

Barbara M. Sargent
Notary Public in and for the County and State first
hereinbefore written.

My commission expires May 19, 1960
A. D. 19 _____

BARBARA M. SARGENT

Notary must PRINT name hereon.

CABLE ADDRESS
"NAMOGRAPH"

Kingsley Stamping Machine Co.

MANUFACTURERS OF
WORLD'S FINEST HOT STAMPING MACHINES
850 CAHUENGA, HOLLYWOOD 38, CALIFORNIA

SOLD TO



Bristow Drug Company
Bay Minette, Alabama

OUR INVOICE NUMBER	DATE	YOUR ORDER DATE OR NUMBER	WE SHIPPED DATE	VIA	TERMS: NET 30 DAYS
17823	10/13/55				
Kingsley Machine #21849 - Fourth years rent					\$ 54.00

KINGSLEY STAMPING MACHINE CO.,
INC., A CORPORATION,

PLAINTIFF

VS

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

DEFENDANT

IN THE CIRCUIT COURT OF
BIBB 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:

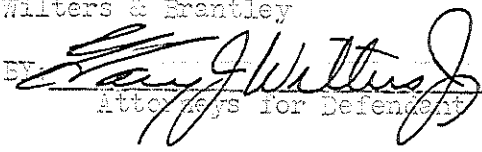
1.

That it does not state a cause of action.

2.

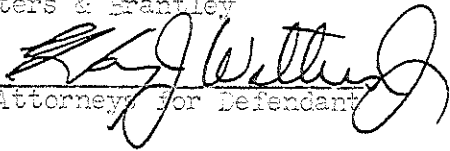
That the amount sued for in Count one, two and three differs from the amount shown in the itemized and verified statement.

Walters & Brantley

BY: 
Attorneys for Defendant

Defendant demands a trial by jury.

Walters & Brantley

BY: 
Attorneys for Defendant

Filed Aug. 27, 1957