

E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA

December 2, 1957

3428
Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

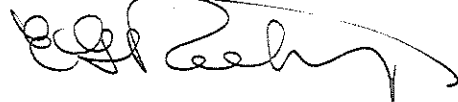
Dear Mrs. Duck:

Inre: Liberty Trouser Company
vs: Anderson's Department Store
Our File: 4318

With this we are handing you Summons and Complaint, in the above styled cause together with itemized and verified statement of account, and my check in the sum of \$20.00 for cost.

Please process and oblige.

Yours very truly,



ts

cc: Dun & Bradstreet, Inc.
Dupl.

E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA

August 8, 1958

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

Dear Mrs. Duck:

Inre: Liberty Trousers
Vs : Anderson's Dept. Store
Our File: 4318

In this case I have filed suit, held up process at the request of Mr. James A. Brice, who wanted to effect a settlement, but as we have not had the corporation from the defendant which would enable us to settle the case, we ask that you put the case on Judge Hall's desk for a judgment by default for \$157.72, which is the amount sued for plus \$11.61, seventeen months interest.

Yours very truly,

EGR

EGR/sl

cc: Client in duplicate
cc: Mr. James Brice

157.72
11 61
169.33

LIBERTY TROUSER COMPANY,
A Corporation,

PLAINTIFF,

-VS-

WILLIAM F. ANDERSON,
Individually and doing business
as ANDERSON'S DEPARTMENT STORE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

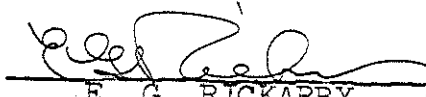
C O M P L A I N T

COUNT I


The Plaintiff claims of the Defendant ONE HUNDRED AND FORTY-SIX DOLLARS AND ELEVEN CENTS (\$146.11) due from him by account on, to-wit, the 26th day of February, 1957; which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant ONE HUNDRED AND FORTY-SIX DOLLARS AND ELEVEN CENTS (\$146.11) due from him for merchandise, goods and chattels sold by the Plaintiff on, to-wit, the 26th day of February, 1957; which sum of money with the interest thereon is still unpaid.


E. G. RICKARBY,
Attorney for the Plaintiff.

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


E. G. RICKARBY,
Attorney for the Plaintiff,

COUNTY OF JEFFERSON
STATE OF ALABAMA

SG-188 (18743)

Be it remembered, that on this 22nd day of November
A. D., 19 57, personally appeared before me, the undersigned authority,
Milton D. Jacobson known to me
who being duly sworn, upon his oath stated that he is Vice-President
of Liberty Trouser Company, 2211 1st Ave., No., Birmingham, Ala.
{ a corporation organized and doing business under the laws of the State of Delaware
{ 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 affidavit; that he is familiar with the books and business of
said _____; that the attached account against
_____ of _____
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 _____
at { ~~its~~
their } special instance and request, that credit has been duly given for all payments and
~~its~~
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of One Hundred Forty Six & 11/100 ----- Dollars
(\$ 146.11) with interest from Mar. 26, 1957 19 _____ is justly due and
remains unpaid.

Milton D. Jacobson

X

Milton D. Jacobson, Vice-President

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 Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

F. B. Love

Notary Public

County of Jefferson State of Alabama
My commission expires April - 19 58 A. D. 19 57

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

WILLIAM F. ANDERSON,

Individually and doing business as ANDERSON'S DEPARTMENT
STORE.

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 WILLIAM F.

ANDERSON, Individually and doing business as -----, Defendant
ANDERSON'S DEPARTMENT STORE

by LIBERTY TROUSER COMPANY, a corporation,

-----, Plaintiff

Witness my hand this 18 day of Dec 19 57

Allice J. Duck, Clerk