

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

December 27, 1957

3435

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

Dear Mrs. Duck:

Inre: W. E. Stephens Mfg. Co.  
Vs: Anderson's Dept. Store  
Our File: 4268

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

Please process and oblige.

Yours very truly,



EGR/ts

Encl.

cc: (dup) American Credit Ind. Co.

W. E. STEPHENS MFG. COMPANY, INC.,  
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 THIRTY-NINE DOLLARS AND EIGHTY-EIGHT CENTS (\$139.88) due from him by account on, to-wit, the 12th day of March, 1957; which sum of money with the interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendant ONE HUNDRED AND THIRTY-NINE DOLLARS AND EIGHTY-EIGHT CENTS (\$139.88) due from him for merchandise, goods and chattels sold by the Plaintiff on, to-wit, the 12th day of March, 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 an itemized and verified statement filed herewith.

  
E. G. RICKARBY,  
Attorney for the Plaintiff

STATE OF TENNESSEE

COUNTY OF DAVIDSON

Before me, the undersigned authority in and for  
aforesaid county and state, as a notary public under my seal of  
office, which seal of office is hereto attached, personally appeared  
W. E. STEPHENS, JR. known to me, who being by me first duly  
sworn, deposed and upon his oath stated that he is PRESIDENT  
of W. E. STEPHENS MFG. CO., INC., a corporation organized and doing  
business under the laws of TENNESSEE; a partnership  
composed of \_\_\_\_\_; a sole trader  
doing business as \_\_\_\_\_; that as such he  
makes this affidavit; that he is familiar with the books and business  
of W. E. STEPHENS MFG. COMPANY, INC. that the attached account  
against ANDERSONS DEPT. STORE is just and correct, within  
the knowledge of this affiant; that he has authority to make this  
affidavit and that he has personal knowledge of the matters contained  
herein; that the items thereon stated and composing the said account  
were sold and delivered to the said ANDERSONS DEPT. STORE at the  
special instance and request of the debtor and that credit has been  
duly given for all payments and just and lawful offsets to which  
said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of <sup>One Hundred and Thirty-Nine</sup> and 88/100 Dollars (\$ 139.88) with  
interest from \_\_\_\_\_, 1957, is justly due and remains  
unpaid.

W. E. Stephens, Jr.  
President

Sworn to, subscribed, acknowledged, signed and sealed before  
me, as a notary public under my seal of office, with my seal hereto  
affixed on this the 26th day of November, 1957

Anne Williams

A notary public in and for the

STATE OF TENNESSEE

COUNTY OF DAVIDSON



A Little BIGGER



A Little BETTER®

WORK CLOTHES - PLAY CLOTHES

## W. E. STEPHENS MFG. CO., INC.

306-308 2nd AVE., N., NASHVILLE 3, TENNESSEE



Anderson's Dept. Store,  
Foley, Ala.

DATE  
March 12, 1957

No.

## DUPLICATE INVOICE

TERMS: 1% 10 DAYS } FROM DATE OF INVOICE  
 NET 30 DAYS }  
 EQUALS 18% PER YEAR  
 F.O.B. NASHVILLE, TENN.  
 YOUR ORDER NO.

SALESMAN

SHIP VIA

Daniel

Truck

771

STOCK NO.	DESCRIPTION	PRICE	DOZ.	EXTENSION	TOTAL
24YZ	Youths Dungarees	25.50	1/4	6.38	
24KZ	Kids Dungarees	19.50	1/2	9.75	
24BZ	Boys Dungarees	24.00	7/12	14.00	
14KZ	Kids Dungarees	19.50	5/12	8.13	
14BZ	Boys Dungarees	24.00	3/4	18.00	
13L	Ladies Jeans	24.00	1 2/12	28.00	
6L	Ladies Jeans	22.50	7/12	13.12	
6G	Girls Jeans	19.50	1 1/4	24.38	
13G	Girls Jeans	21.75	10/12	18.12	139.88

You may deduct UP TO \_\_\_\_\_ Credit Certificates when mailed with your check paying this invoice within our terms. If you have fewer certificates, deduct only the number you have. If you have none, deduct none.

(Only certificates returned with check may be deducted.)

NO CREDIT WILL BE GIVEN FOR GOODS RETURNED WITHOUT OUR PERMISSION.

IT IS UNDERSTOOD THAT THE SELLER OF THE GOODS COVERED IN THIS ORDER WARRANTS THAT THE SAID GOODS HAVE BEEN PRODUCED IN COMPLIANCE WITH THE REQUIREMENTS OF THE FAIR LABOR STANDARDS ACT OF 1938 (FEDERAL WAGE AND HOUR LAW). Based upon a guaranty received it is hereby guaranteed that reasonable and representative tests, made according to the procedures prescribed in Section 4 (a) of the Flammable Fabrics Act, show that fabrics used or contained in the articles of wearing apparel and fabrics otherwise subject to said Act, covered by and in the form delivered under this document, are not, under the provisions of such Act, so highly flammable as to be dangerous when worn by individuals.

DEDUCT 1.40

IF CHECK IS MAILED  
WITHIN 10 DAYS  
FROM DATE OF INVOICE.

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, Ind. and doing business as ANDERSON'S DEPT. STORE, Defendant.---

by W. E. STEPHENS MANUFACTURING COMPANY, INC., a corporation,

\_\_\_\_\_, Plaintiff.---

Witness my hand this \_\_\_\_\_

day of \_\_\_\_\_

19 58

Reece J. Duck Clerk