

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon J. M. BRISTOW, Individually, and doing business as BRISTOW'S DRUG STORE, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of the BULOVA WATCH COMPANY, INC., a New York corporation.

Witness my hand this the 18 day of March, 1958.

Deice J. Duck  
Clerk

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COMPLAINT

BULOVA WATCH COMPANY, INC.,  
a New York Corporation,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

J. M. BRISTOW, Individually,  
and doing business as  
BRISTOW'S DRUG STORE,

AT LAW

DEFENDANT

COUNT I:

Plaintiff claims of the defendant TWO HUNDRED SIXTY & 09/100 DOLLARS (\$260.09), due from him by account on, to wit: the 31st day of July, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT II:

Plaintiff claims of the defendant TWO HUNDRED SIXTY & 09/100 DOLLARS (\$260.09), due from him on account stated between the plaintiff and the defendant on, to wit: the 31st day of July, 1957, which sum of money, with interest thereon, is still unpaid.

COUNT III:

Plaintiff claims of the defendant TWO HUNDRED SIXTY & 09/100 DOLLARS (\$260.09), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 31st day of July, 1957, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 27th day of December, 1957.

The undersigned attorney will be personally responsible for the court costs.



Attorney for Plaintiff

Defendant's address is  
Bay Minette, Alabama.

*Filed March 18, 1958*

elved 18 day of mar. 1958  
on 18 day of Mar. 1958  
served a copy of the within R/C.  
J. M. Bristow

service on

TAYLOR WILKINS, Sheriff  
By W. A. Jullent D. S.  
o. m.

SUMMONS AND COMPLAINT

BULOVA WATCH COMPANY, INC.,  
A NEW YORK CORPORATION,

PLAINTIFF

VS:

J. M. BRISTOW, INDIVIDUALLY,  
AND DOING BUSINESS AS BRISTOW'S  
DRUG STORE,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAR 18 1958

ALICE J. DUCK, Clerk  
LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA



PROOF OF CLAIM

State of New York }  
County of Queens } ss

I, A. Carnow, being first duly sworn, depose and state that:

1. I am engaged in business under the name and style \_\_\_\_\_

2. I am a partner in the firm of \_\_\_\_\_ (Fill in names of partners)  
doing business as \_\_\_\_\_

3. I am Treasurer of the Bulova Watch Co. Inc

a corporation incorporated under the laws of the state of New York and that the annexed bill of particulars is a true and correct copy of the account due Bulova Watch Co.

and against Bristow's Drug & Fry and that the items of debit and credit therein contained, are to my personal knowledge true and correct, and that, after allowing all just credits

and set-offs, there is justly due and unpaid thereon the amount of \$ 76.09 with legal interest to date.

Subscribed and sworn to before me this

27th day of December, 1957

Bertha M. McGovern

182362 H. BERTHA MCGOVERN Notary Public  
NOTARY PUBLIC STATE OF NEW YORK  
NO. 41-753-800  
QUALIFIED IN QUEENS COUNTY  
COMMISSION EXPIRES MARCH 30, 1958

Original Filed in Probate Court  
DC@16-58. JPC





BULOVA WATCH COMPANY, INC.,  
A NEW YORK CORPORATION,

PLAINTIFF

VS

J. M. BRISTOW, individually,  
and d/b/a BRISTOW DRUG STORE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 3432

The Defendant for answer to the Plaintiff's complaint and each count thereof separately and severally says:

1.

That he is not guilty of the matters alleged therein.

Wilters & Brantley

BY: Gene J. Wilters, Jr.  
Attorneys for the Defendant

*Filed April 17, 1958*

AMENDED COMPLAINT

BULOVA WATCH COMPANY, INC.,  
a New York Corporation

PLAINTIFF

VS:

J.M. BRISTOW, Individually,  
and doing business as  
BRISTOW'S DRUG STORE

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 3432

Comes the plaintiff and amends this complaint by adding the following counts in addition to the three counts in the original complaint.

COUNT IV:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 00/100 DOLLARS (\$132.00), due by promissory note made by him on the 27th day of August, 1956, and payable on the 20th day of October, 1956, with interest thereon.

COUNT V:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 00/100 DOLLARS (\$132.00), due by promissory note made by him on the 27th day of August, 1956, and payable on the 20th day of January, 1957, with interest thereon.

COUNT VI:

The plaintiff claims of the defendant ONE HUNDRED THIRTY TWO & 00/100 DOLLARS (\$132.00), due by promissory note made by him on the 27th day of August, 1956, and payable on the 20th day of February, 1957, with interest thereon.

COUNT VII:

The plaintiff claims of the defendant TWO HUNDRED FIFTY & 00/100 DOLLARS (\$250.00), due by a check dated the 21st day of December, 1957, drawn on the First National Bank of Bay Minette, Bay Minette, Alabama, by J.M. Bristow and payable to the order of the Bulova Watch Co., which check was returned by said bank because of insufficient funds, said amount remaining due and unpaid, with interest thereon.

*Filed*  
*June 24, 1958*

  
Attorney for Plaintiff