

NAMIE PACKING COMPANY,
A Corporation,

Plaintiff.

-VS-

MABEL FRUITT WRIGHT,
individually, and doing
business as BELFOREST
MERCANTILE COMPANY,

Defendant.

Y
Y
Y
Y
Y
Y

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

3753

C O M P L A I N T

COUNT I

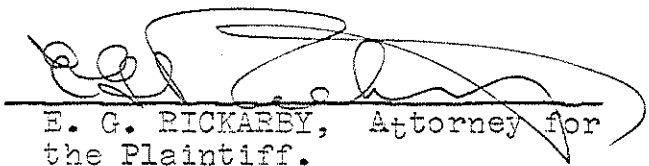
The Plaintiff claims of the Defendant the sum of ONE HUNDRED AND FORTY-SIX DOLLARS AND THIRTY CENTS (\$146.30) due from it by account on, to-wit, the 16th day of July, 1958; which sum of money with interest thereon is still unpaid.

COUNT II

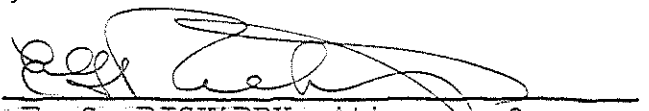
The Plaintiff claims of the Defendant SEVENTY-FIVE DOLLARS AND FIFTY-TWO CENTS (\$75.52) due from her for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 16th day of July, 1958, which sum of money with interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of SEVENTY DOLLARS AND SEVENTY-EIGHT CENTS (\$70.78) due from her for check given by the Defendant to the Plaintiff in July, 1958, and which was returned to the Plaintiff because of insufficient funds.


E. G. RICKARBY, Attorney for
the Plaintiff.

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


E. G. RICKARBY, Attorney for
the Plaintiff.

COUNTY OF Mobile

8C-188 (13743)

STATE OF Alabama

Be it remembered, that on this 13 day of Jan. 1959
A. D., 1959, personally appeared before me, the undersigned authority,

known to me
who being duly sworn, upon his oath stated that he is B. E. Namie
of Namie Packing Company

{ a corporation organized and doing business under the laws of the State of Alabama
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of B. E. Namie Sr., Be E. Namie Jr., Idabelle Namie &
J. W. Mobley

a sole trader doing business as Namie Packing Company
and that as such he makes this affidavit; that he is familiar with the books and business of
said Namie Packing Company; that the attached account against
Belforest Merc. Company of Belforest, Alabama

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 Belforest Merc. Company

at { its }
their } special instance and request, that credit has been duly given for all payments and
his }

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 dollars and 30/100 Dollars
(\$ 146.30) with interest from 19 is justly due and
remains unpaid.

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.

Notary Public

County of Mobile State of Alabama
My commission expires 1959 A. D. 1959

My commission expires on 1959
Bonded by American Surety Co. of N. Y.

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 MABEL PRUITT WRIGHT, individually and
doing business as BELFOREST MERCANTILE COMPANY,

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 MABEL PRUITT
Mercantile Company
WRIGHT, individually and doing business as Belforest/, Defendant---

by NAMIE PACKING COMPANY, a Corporation.

-----, Plaintiff---

Witness my hand this 26 day of January 19 59.

Aestef-Kerck, Clerk

No. 3753

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

NAMIE PACKING COMPANY,

A Corporation,

Plaintiffs

vs.

MABEL PRUITT WRIGHT,
INDIVIDUALLY, and doing
business as BELFOREST MERCANTILE
COMPANY, Defendants

Summons and Complaint

Filed _____

FILED

19

JAN 26 1959

Clerk

ALICE J. DUCK, CLERK
REGISTER

E. G. RICKARBY,
Attorney at Law,
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Belforest, Alabama

Received In Office

Jan 26 1959

, Sheriff

I have executed this summons

this 26 Jan 1959

by leaving a copy with

Mabel Pruitt

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff
Deputy Sheriff
B. Frost

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

January 23, 1959

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

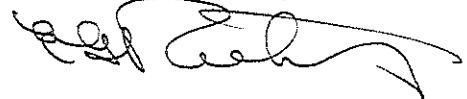
Dear Mrs. Duck:

Inre: Namie Packing Company
Vs: Belforest Mercantile Company
Our File: 4611

With this we are handing you Summons and Complaint together with itemized and verified statement of account, in the above styled cause.

Please process, hand to sheriff and when defendant has been served, notify me. Thanks.

Yours very truly,



ts
Encl.
cc: (Namie Packing Co.)
Dun & Bradstreet, Inc.

STATEMENT

TERMS WEEKLY

Mobile, Ala.,

195

M

Belforest Merc Co
Belforest, Ala.

IN ACCOUNT WITH

NAMIE PACKING COMPANY

Sausage Manufacturers—Packing House Products

151 IRDOUOIS STREET

PHONE GL 7-3321

CHICKASAW, ALABAMA

BALANCE

TO MDSE.

3028 111.52

pd. 8/13/58 - 10.00

" 8/27/58 - 5.00

9/18/58 - 6.00

- 5.00

10/11/58 - 5.00

10/19/58 - 5.00

- 5.00

11/12/58

75.52

Return check 70.78

146.30

NAMIE PACKING CO. *duplicate*

Sausage Manufacturers - Packing House Products #3028

Phone GL 7-3321

151 Iroquois Street
P. O. Box 146
Chickasaw, Ala.

Mobile, Ala.,

7-16 19 58

Sold To

Belforest Merc Co.

Address

Belforest, Ala.

	DESCRIPTION	WEIGHT	PRICE	AMOUNT
$\frac{3}{6}$	<i>Spic Ich Meat</i>	18	47	8 46
$\frac{2}{6}$	<i>Slab Bacon King</i> ^{10 15} 11	21 15	56	12 29
4	<i>all meat Charlie Billo</i>	14 1/2	42	5 99
1	<i>Co. 1/4 Pure Lard</i>	48	18	8 64
1	<i>Buf Fryers 2 - 2 1/4</i>	63	36	22 68
1	<i>Co. 1/4 Pure Lard</i>	48	18	8 64
3	<i>all meat Balgo</i>	22 1/2	42	9 45
1	<i>Co. 1/2 Pure Lard</i>	out	48	out
$\frac{2}{10}$	<i>Loose Hot Saus.</i>	20	45	9 00
$\frac{1}{10}$	<i>Truck Bones</i>	25	17	4 25
$\frac{1}{10}$	<i>Loose P.P. Saus Saus</i>	10	61	6 10
$\frac{1}{6}$	<i>1# Wind.</i>	6	51	3 06
1	<i>N S Bellu D. 35/40</i>	40 1/2	32	12 96

111.52.