

MAC LEVY ASSOCIATES, INC.,
A Corporation

PLAINTIFF

-VS-

MRS. THELMA LITTLE, indivi-
dually and doing business as
THELMA'S BEAUTY SHOP

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

3783

C O M P L A I N T

COUNT I

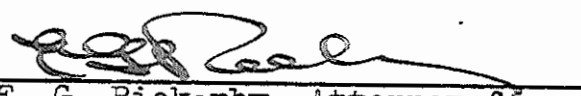
The Plaintiff claims of the Defendants ONE HUNDRED NINETEEN AND 52/100 DOLLARS, (\$119.52) due from it by account on the 15th day of April, 1957, which sum of money with interest thereon is still unpaid.

COUNT II

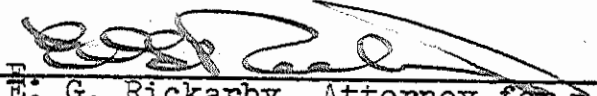
The Plaintiff claims of the Defendants ONE HUNDRED NINETEEN AND 52/100 DOLLARS, (\$119.52) due from it for merchandise, goods and chattels sold by the Plaintiff to the Defendants on, to-wit, the 15th day of April, 1957, which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant ONE HUNDRED NINETEEN AND 52/100 DOLLARS (\$119.52) due from her on accounts stated between the Plaintiff and the Defendants on, to-wit, the 15th day of April, 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 of account, filed herewith.


E. G. Rickarby, Attorney for
the Plaintiff.

MAC LEVY ASSOCIATES, INC.
A Corporation

PLAINTIFF

-VS-

MRS. THELMA LITTLE, individually
and doing business as THELMA'S
BEAUTY SHOP

DEFENDANTS

C O M P L A I N T

IN THE CIRCUIT
COURT OF BALDWIN
COUNTY, ALABAMA

STATE OF NEW YORK,
COUNTY OF NEW YORK.

Before me, the undersigned notary public, personally appeared Emanuel R. Moubert, who, being first duly sworn, deposes and says that he is the Executive Vice-President of MAC LEVY ASSOCIATES, INC., a Corporation, the owner of the attached account and that the attached account is correct statement of account between MAC LEVY ASSOCIATES, INC., and MRS. THELMA LITTLE, individually, and doing business as THELMA'S BEAUTY SHOP, and that there is owing from the said MRS. THELMA LITTLE, individually and doing business as THELMA'S BEAUTY SHOP to the said MAC LEVY ASSOCIATES, INC., a Corporation, the sum of ONE HUNDRED AND NINETEEN AND 52/100 (\$119.52) DOLLARS, with interest from April 15, 1957.

Emanuel R. Moubert
AFFIANT

Subscribed and sworn to before me on this the 6 day of
July, 1957.

Emanuel Prosky
Notary Public
SEYMOUR E.
Notary Public, State of New York
No. 22-8403860
Qualified in Kings County
Term Expires March 30, 1960



ASSOCIATES, INC.

Nº 2385

New York Sales Office

189 LEXINGTON AVENUE NEW YORK 16, N. Y.
MUrray Hill 5-8620-21-22-23-24

To: Mrs. Ayres C. Littler
Thelma's Beauty Salon
Bay Minette, Ala.

SHIP TO:

ALL SHIPMENTS:
F. O. B. - PLANT

DATE	OUR ORDER NO.	CUSTOMER ORDER NO.	DATE SHIPPED	VIA	TERMS
4/24 /57			February 26/57	Universal	NET CASH

1 Roaler Massager
1 Bike Exerciser
1 Platform

Shipping charges

15 02



ASSOCIATES, INC.

New York Sales Office

189 LEXINGTON AVENUE NEW YORK 16, N. Y.
Murray Hill 5-8620-21-22-23-24

Nº

2577

To: Thelmas Beauty Shop
Bay Minette, Alabama

SHIP TO:

ALL SHIPMENTS:
F. O. B. - PLANT

DATE	OUR ORDER NO.	CUSTOMER ORDER NO.	DATE SHIPPED	VIA	TERMS
4/18/57	3021		4/17/57	Universal	NET CASH

1

elevated Roaler Massager

\$110

00

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mrs. Thelma Little

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 Mrs. Thelma

Little, individually and doing business as THELMA'S BEAUTY SHOP, Defendant

by MAC LEVY ASSOCIATES, INC., A Corporation

....., Plaintiff.....

Witness my hand this 5 day of March 19 59.

Aricef. Wick, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MAC LEVY ASSOCIATES, INC.

A Corporation,

Plaintiffs

vs.

MRS. THELMA LITTLE, Indi-

vidually and doing business
as THELMA'S BEAUTY SHOP

Defendants

SUMMONS and COMPLAINT

Filed FILED, 19.....

MAR 5 1959, Clerk

ALICE J. DUCK, CLERK
REGISTER

E. G. Rickarby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

RECEIVED IN OFFICE

_____, 19.....

_____, Sheriff

I have executed this summons

this 3 March, 1959

by leaving a copy with

Thelma Little

Hyb Wilkins, Sheriff

W. A. Zeller, Deputy Sheriff

omi

MAC LEVY ASSOCIATES, INC.,
A Corporation,

Plaintiff,

VS.

MRS. THELMA LITTLE, indi-
vidually and doing business
as THELMA'S BEAUTY SHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

P L E A S

Comes the defendant in the above styled cause and for answer to the complaint heretofore filed in said cause and each and every count thereof, separately and severally, sets down and assigns the following separate and several please

1.

The allegations of the complaint are untrue.

2.

That in, to-wit, November or December, 1956, the defendant bought certain merchandise from the plaintiff at a total cost of approximately \$3,000.00; that under and the terms of said purchase, defendant paid for the said merchandise in advance; that included in said purchase was one Upright Roller Massager, two Figurama Tables and One Vibratory Machine; that when the merchandise was shipped to her, the plaintiff setⁿ a Floor Model Roller Massager rather than the Upright Model which she had purchased and paid for in advance; that she immediately shipped back to plaintiff the said Floor Model and that plaintiff then shipped her the Upright Model in accordance with their original agreement; and that plaintiff then billed her for \$119.00, the difference in price between the Floor Model and the Upright Model; and that defendant had been given a better price on the Upright Model by plaintiff originally to induce her to buy all of the equipment from plaintiff; and that she is not indebted to plaintiff in any amount.

Julius A. Mashburn
Attorney for Defendant.

STATE OF ALABAMA, 0
COUNTY OF BALDWIN. 0

Before me, T. J. Mashburn, Jr., a Notary Public in and for said County and State, personally appeared THELMA LITTLE, who is

known to me, and who being by me first duly sworn, deposes and says, on oath: "I have read the above and foregoing pleas and the same are true and correct." Further deponent says not.

Shilma Little

Sworn to and subscribed before me on this the 3rd day of April, 1959.

J. G. Maddison, Jr.
NOTARY PUBLIC, BALDWIN COUNTY, ALA.

Defendant demands a jury trial of
this cause.

J. G. Maddison
attorney for Defendant

Filed
April 3, 1959
Alice J. Luck
Clerk.

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

P. O. BOX 71

March 4, 1959

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

Dear Mrs. Duck:

Inre: MacLevy

VS: Thelma's Beauty Shop

Enclosed find Check for \$15.00 for court cost
in the above mentioned case.

Yours very truly,



EGR/eb

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

February 6, 1959

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

Dear Mrs. Duck:

Inre: MacLevy Associates, Inc.
Vs: Thelma's Beauty Shop
Our File: 4618

With this we are handing you Summons and Complaint,
together with itemized and verified statement of
account, together with client's check for costs
in the sum of \$15.00.

Please process, and oblige.

Yours very truly,



ts
encl.
cc: Julius Weiss

MACLEVY ASSOCIATES, INC.,
A Corporation,

Plaintiff,

VS.

MRS. THELMA LITTLE, indi-
vidually and doing business
as THELMA'S BEAUTY SHOP,


Defendant.


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

TO Mrs. Thelma Little, Defendant. The above named Thelma Little will take notice that on Friday, the 4th day of September, 1959, the Plaintiff will take the deposition of Monty MacLevy, whose address is MacLevy Associates, 114 East 40th street, New York City, New York and Emanuel R. Moubert, whose address is MacLevy Associates, 114 East 40th street, New York City, New York, these being nonresidence of the state of Alabama. Said testimony is to be used as evidence in the trial of the above style cause. The deposition is to be taken before a competent authority at the offices of MacLevy Associates, Inc., at the address of 114 East 40th street, New York City, New York at the hour of 10 o'clock A. M. with authority to adjourn from day to day until all such depositions shall have been taken.

Dated this 25 day of August, 1959.


E. G. Rickarby
Attorney for Plaintiff

Copy this day mailed
to Selma Macklin Esq
Atty for Def.


MACLEVY ASSOCIATES, INC.,
A Corporation,

Plaintiff,

VS.

MRS. THELMA LITTLE, indi-
vidually and doing business
as THELMA'S BEAUTY SHOP,

Defendant.

IN THE CIRCUIT COURT OF
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Dated this 25 day of August, 1959.



E. G. Rickard
Attorney for Plaintiff

3783

FILED

AUG 27 1959

ALICE J. DUCK, CLERK
REGISTER