

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

June 20, 1959

3824

Hon. H. M. Hall
Circuit Judge
Bay Minette, Alabama

Re: Lincoln Granite Co.
vs: J. Fred Thrasher & William S. Todd,
d/b/a Thrasher & Todd Monument Co.

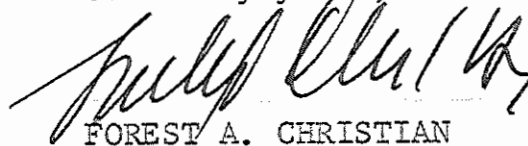
Dear Judge:

Kindly enter a default Judgement in this case on an itemized sworn statement of account for \$702.50, which includes interest.

I do not believe that Mr. Todd has been served, but this is against a partnership and service on one partner should be sufficient. If not, and Todd has not been served, you may strike him.

With best wishes, I am

Cordially yours,


FOREST A. CHRISTIAN

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon J. FRED THRASHER & WILLIAM S. TODD D/B/A THRASHER & TODD MONUMENT CO., 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, Alabama, at the place of holding same by LINCOLN GRANITE CO., a Georgia corporation.

Witness my hand this the 28th day of April, 1959.

Clerk

|||||

COMPLAINT

LINCOLN GRANITE CO., a
Georgia corp. PLAINTIFF

VS:

J. FRED THRASHER

86

WILLIAM S. TODD, D/B/A
THRASHER & TODD MONUMENT CO.
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant SIX HUNDRED FIFTY TWO & 22/100 DOLLARS (\$652.22), due from him by account on, to wit: the 19th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant SIX HUNDRED FIFTY TWO & 22/100 DOLLARS (\$652.22), due from him on account stated between the plaintiff and the defendant on, to wit: the 19th day of January, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant SIX HUNDRED FIFTY TWO & 22/100 DOLLARS (\$652.22) due from for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 19th day of January, 1958, 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 15th day of April, 1959.

Attorney for Plaintiff

County of Elbert
State of Georgia } SS:

Before me, Robert O. Dewberry a Notary Public duly commissioned and sworn in
Notary Public

and for the above state and county, this day personally appeared James A. Hosselton
Name of Officer
to me well known, who being by me first duly sworn says that:

*1. He is an individual trading as _____

*2. That he and _____

are partners trading as _____

*3. That he is General Manager of ~~NATIONAL~~ Lincoln Granite Company
Title Name of Creditor

of Elberton, Georgia a corporation incorporated under the laws of the State of Georgia
City and State Address

and that the foregoing account in favor of Lincoln Granite Company
Creditor

and against Thrasher & Todd Monument Company, Bay Minette, Alabama
Debtor

showing a balance and amount due of ~~\$562.22~~ \$652.22
Amount

with _____ interest from the _____ day of _____ 19 _____

until paid, is within his knowledge just, true and correct; that it is justly and truly due and unpaid; that all just and lawful offsets, credits, discounts and payments have been allowed and the said amount is due, after said allowance and exclusive of all set-offs and just grounds of defense; that the goods in said accounts were sold and delivered as therein charged and on said last named day said amount became due and payment thereof was demanded and no part of same has been paid.

The affiant is not able to determine whether or not the debtor is in the military service of the United States.

James A. Hosselton
Signature of Officer

Sworn to and subscribed before me this fifteenth day of April 19 59

Robert O. Dewberry
Notary Public Signature

My commission expires Sept. 16, 1961

*Use paragraph covering.

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Company
Bay Minette, Alabama

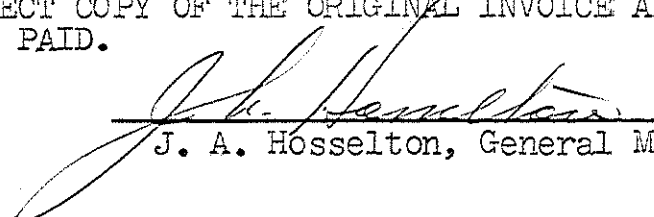
DATE ENTERED 7-25-57	YOUR ORDER 7-25-57	DATE TO BE SHIPPED	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE CUSTOMER'S TRUCK				DATE SHIPPED 7-25-57
				ORDER NO. 2466

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

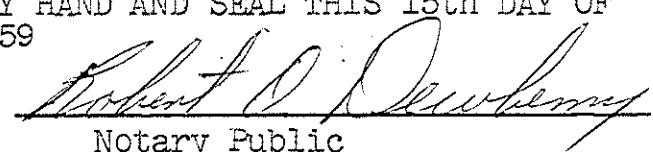
GRANITE: LINCOLN BLUE:	F.O.B. ELBERTON, GA.
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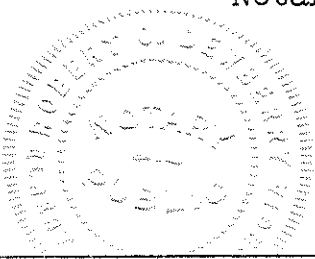
6 Markers 1-8 x 0-10 x 0-6	Polished bevel tops; Bal. rock pitched; Bottoms level.	\$48.30
6 Markers 1-4 x 0-8 x 0-6	Polished bevel tops; Bal. rock pitched; Bottoms level.	<u>35.10</u>
		\$83.40
	Paid 10-30-58	<u>43.43</u>
	Balance	\$39.97

THIS IS TO CERTIFY THAT THE ABOVE IS A TRUE AND CORRECT COPY OF THE ORIGINAL INVOICE AND HAS NOT BEEN PAID.


J. A. Hosselton, General Manager

WITNESS MY HAND AND SEAL THIS 15th DAY OF
APRIL, 1959


Notary Public



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INVOICE

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Co.
Bay Minette, Alabama

DATE ENTERED 6-27-57	YOUR ORDER 6-25-57	DATE TO BE SHIPPED AUG. 15	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE Customer's Truck			DATE SHIPPED 9-24-57	ORDER NO. 2407

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

AVERAGE STOCK:

2 Hickeys 2-0 x 1-0 x 0-8 Pol. 2" bevel; Bal. rock pitched; Bottom sawed. \$22.40

1 Base 6-0 x 1-6 x 0-8 Pol. flat top; Bal. rock pitched; Bottom level. 48.90

SOME KIND OF BABY CARVING:

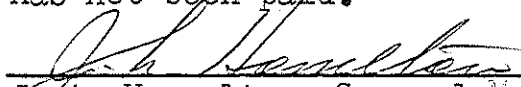
2 Slants 1-2 x 0-8 x 1-2 Pol. slant face; Carved 1; Serp. top; Bal. rock pitched; Bottom sawed. 35.10

(2 Per B-1228; 2 Per B-1230):

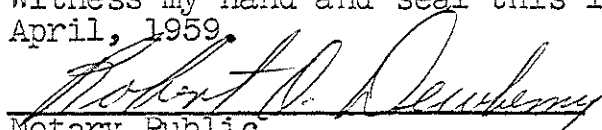
4 Slants 2-0 x 0-10 x 1-4 Pol. slant; Carved 1; 2 Oval tops; 2 Serp. tops; Bal. rock pitched; Bottoms sawed. 109.80

\$216.20

This is to certify that the above is a true and correct copy of the original invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th day of April, 1959.


Notary Public

INVOICE

73

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Company
Bay Minette, Alabama

DATE ENTERED 9-24-57	YOUR ORDER 9-24-57	DATE TO BE SHIPPED	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE Customer's Truck			DATE SHIPPED 9-24-57	ORDER NO. 2628

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

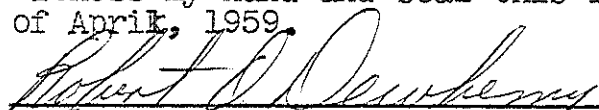
Slant Face Markers Random Stock:

1-8 x 0-8 x 1-2	\$14.30
1-8 x 0-10 x 1-2	15.20
2-0 x 0-8 x 1-4	22.45
2-4 x 0-10 x 1-4	10.00
1 Slant Marker	15.00
1 Marker 2-6 x 0-10 x 1-4	26.35
1 Marker	3.00
	<u>\$106.30</u>

This is to certify that the above is a true and correct copy of the original invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th day
of April, 1959.


Notary Public

INVOICE

74

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Company

Bay Minette, Alabama

DATE ENTERED 8-30-57	YOUR ORDER 8-27-57	DATE TO BE SHIPPED AS NEEDED	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE Customer's truck				DATE SHIPPED 9-24-57
				ORDER NO. 2570

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE

F.O.B. ELBERTON, GA.

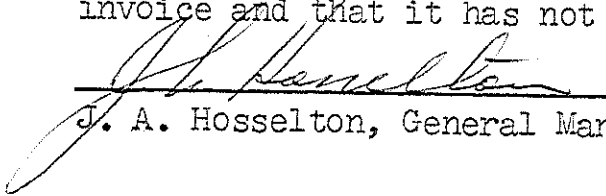
AVERAGE STOCK:

6 Markers 2-0 x 1-0 x 0-6

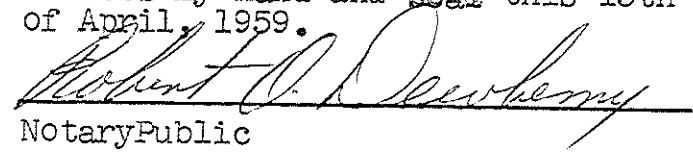
Polished bevels; Bal. rock
pitched; Bottoms sawed.

\$61.20

This is to certify that the above is a
true and correct copy of the original
invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th day
of April, 1959.


Notary Public

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INVOICE

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Thrasher & Todd Monument Company
Box 12
Bay Minette, Alabama

DATE ENTERED 7-22-57	YOUR ORDER 7-19-57	DATE TO BE SHIPPED This week if Possible	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE Customer's Truck			DATE SHIPPED 9-24-57	ORDER NO. 2452

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

PER RUBBING:

1 Slant 2-0 x 1-0 x 1-4

Polished & Carved slant face;
Bal. rock pitched; Bottom
jointed.

1 Base 2-8 x 1-4 x 0-6


Pol. flat top; Bal. rock
pitched; Bottom level.

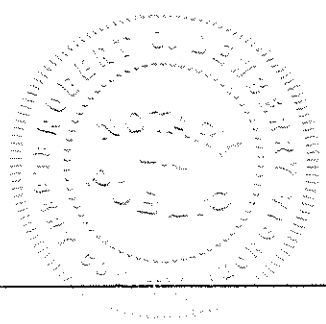
\$50.65

This is to certify that the above is a
true and correct copy of the original
invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th Day
of April, 1959.


Notary Public



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INVOICE

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Thrasher & Todd Monument Co.
Bay Minnette, Alabama

DATE ENTERED	YOUR ORDER	DATE TO BE SHIPPED	SALESMAN	TERMS	
12-3-57	12-3-57	Within 10 Days	McAllister	3% Disc. 15 Days: Net 30	
ROUTE				DATE SHIPPED	ORDER NO.
Customer's Truck - Advise when ready				12-19-57	2787

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

AVERAGE STOCK:

PER NAL 213 (Mod.):

1 Die 4-10 x 0-6 x 1-8

Pol. 2; Oval top & convex ends;
Bal. rock pitched; S/B Lettered
2 sides and Carved 1; Bottom
jointed.

B O E S C H E N

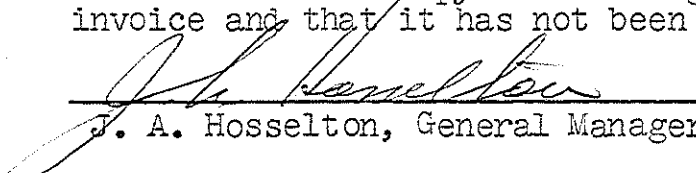
(Verses on carved sides as design shows)

1 Base 6-0 x 1-0 x 0-6

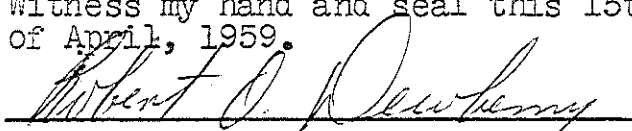
Pol. flat top; Bal. rock
pitched; Bottom level.

\$122.00

This is to certify that the above is a
true and correct copy of the original
invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th day
of April, 1959.


Notary Public

INVOICE

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Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Company
Bay Minette, Alabama

DATE ENTERED	YOUR ORDER	DATE TO BE SHIPPED	SALESMAN	TERMS
12-5-57	12-5-57	S. A. P.	MCALLISTER	3% Disc. 15 Days: Net 30
ROUTE	Customer's truck			DATE SHIPPED 12-19-57
				ORDER NO. 2788

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

AVERAGE STOCK:

CARVED PER NAL 213 (Modified):

1 Slant 2-0 x 0-10 x 1-4

Pol. slant; Oval top; Bal. rock
pitched; Bottom sawed; S/B
Carved; S/B Lettered; (No verse
or flowers).

HERMAN C. BOESCHEN

DEC. 5, 1974

SEPT. 6, 1941

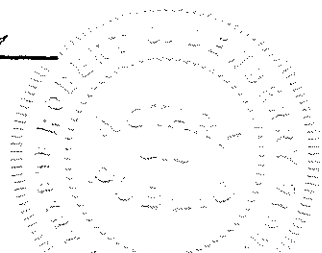
\$37.00

This is to certify that the above is a
true and correct copy of the original
invoice and that it has not been paid.

J. A. Hosselton
J. A. Hosselton, General Manager

Witness my hand and seal this 15th day
of April, 1959.

Robert O. Dewberry
Notary Public



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INVOICE

Lincoln Granite Company

"Lincoln Blue"

The Pride of Elberton

ELBERTON, GEORGIA
THE GRANITE CENTER OF THE SOUTH

SOLD TO .

Trasher & Todd Monument Company
Bay Minette, Alabama

DATE ENTERED 12-19-57	YOUR ORDER 12-19-57	DATE TO BE SHIPPED	SALESMAN McAllister	TERMS 3% Disc. 15 Days: Net 30
ROUTE Customer's Truck			DATE SHIPPED 12-19-57	ORDER NO. 2814

ALL CONTRACTS AND AGREEMENTS CONTINGENT UPON STRIKES, ACCIDENTS AND OTHER CONDITIONS BEYOND OUR CONTROL. CLAIMS FOR DAMAGE, LOSS OR DETENTION MUST BE MADE ON THE TRANSPORTATION COMPANIES. OUR RESPONSIBILITY CEASES WHEN WE OBTAIN A RECEIPT FOR GOODS SHIPPED IN GOOD ORDER

GRANITE: LINCOLN BLUE:

F.O.B. ELBERTON, GA.

FOR LETTERING TWO MARKERS

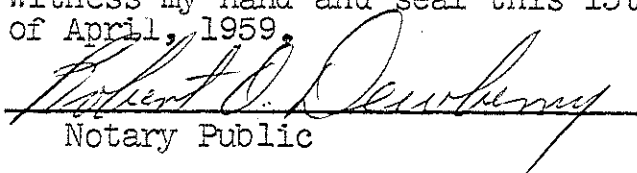
63 Letters @ \$.30

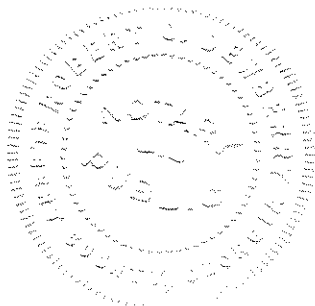
\$18.90

This is to certify that the above is a true and correct copy of the original invoice and that it has not been paid.


J. A. Hosselton, General Manager

Witness my hand and seal this 15th day of April, 1959.


Notary Public



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INVOICE

700.3824 ✓
Received 28 day of April 1959
d on 2 day of May 1959
served a copy of the within V & C
J. Fred Thrasher
William R. Todd
y service on _____

TAYLOR WILKINS, Sheriff

By W. A. Tolbert D. S.

8-mc

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LINCOLN GRANITE CO., a
Georgia corp. PLAINTIFF

VS:

J. FRED THRASHER & WILLIAM
S. TODD, D/B/A THRASHER &
TODD MONUMENT CO.
DEFENDANT

FILED

APR 28 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA