

NELSON RADIO & SUPPLY COMPANY,  
INC., a corporation,  
Plaintiff,

vs

J. R. MATHEWS, Individually and  
doing business as Mathews Furn-  
iture Company,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

No. 4027

Comes the Defendant in the above entitled cause and for  
answer to the complaint filed therein says that the allegation of  
the complaint are untrue.

John P. Beebe  
Attorney for Defendant

The Defendant demands trial by jury.

I hereby certify that I have on this the 20th day of Nov-  
ember, 1959, sent a true and exact copy of the foregoing answer by  
United States Mail, postage prepaid, to Messrs. Brutkiewicz & Crain,  
Van Antwerp Building, Mobile, Alabama, attorneys of record for the  
Plaintiff.

*Filed*  
11-21-59

John P. Beebe  
Attorney for Defendant.

4027 *(Stamp)*

NELSON RADIO & SUPPLY  
COMPANY, a corporation,  
Plaintiff,

vs

J. R. WATHEWS, Individually  
and doing business as  
Mathews Furniture Company,  
Defendant.

-----  
Answer  
-----

**FILED**

NOV 21 1951

ALICE J. DUCK, CLERK  
REGISTER

4027

Donald E. Brutkiewicz  
1001 ATTORNEY AT LAW  
~~XXXXXX~~ VAN ANTWERP BLDG.  
MOBILE, ALABAMA



October 26, 1959

Honorable Alice J. Duck  
Clerk, Register  
Circuit Court Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed is a suit on the Law Side of the Circuit Court  
that I would like to have filed in the Baldwin County Circuit  
Court. Would you please file the same for me and advise  
me of the date it is set.

Thankingyou for t<sup>h</sup>is consideration, I am

Yours very truly,

*Donald E. Brutkiewicz*  
DONALD E. BRUTKIEWICZ

DEB:lh

Enclosure (Suit)

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 1027

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J.R. MATTHEWS, Ind. & d/b/a MATTHEWS FURNITURE 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, State of Alabama, at Bay Minette, against-----

J.R. MATTHEWS, Ind. & d/b/a MATTHEWS FURNITURE CO.-----, Defendant-----

by NELSON RADIO & SUPPLY CO., Inc. a Corp.-----

-----, Plaintiff-----

Witness my hand this 27 day of October 19 59

Alice J. Duck-----, Clerk

No. 4027 Page \_\_\_\_\_

**The State of Alabama**

Baldwin County

**CIRCUIT COURT**

NELSON RADIO & SUPPLY CO.,

Inc. a Corp.

Plaintiffs

vs.

J. R. MATTHRES, Ind. & d/b/a

MATTHEWS FURNITURE CO.

Defendants

**Summons and Complaint**

Filed October 27, 1959

Alice J. Duck Clerk

\_\_\_\_\_  
Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

Defendant lives at

Received In Office

\_\_\_\_\_  
19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_  
Sheriff

\_\_\_\_\_  
Deputy Sheriff

NELSON RADIO & SUPPLY COMPANY, ) IN THE CIRCUIT COURT OF  
INC., A corporation, )  
Plaintiff, ) BALDWIN COUNTY, ALABAMA,  
VS ) AT LAW.  
J. R. MATHEWS, Individually ) CASE NO. 4627.  
and Doing Business As )  
Matthews Furniture Company, )  
Defendant. )

COUNT ONE: Plaintiff claims of the Defendant the sum of One Thousand Thirty-Eight and 46/100 (\$1,038.46) Dollars, due by promissory note made by him on the 10th day of December, 1958, and payable on the 25th day of June, 1959, with interest thereon.

Plaintiff further claims of the Defendant the sum of \$346.15, as attorney's fee which Plaintiff avers Defendant agreed to pay by the written provisions of said promissory note.

Plaintiff further avers that Defendant did by the terms of said promissory note waive all right of exemption under the Constitution and laws of the State of Alabama or any other State.

BRUTKIEWICZ & CRAIN

BY: Donald E. Brutkiewicz  
Attorneys for Plaintiff

Defendant's Address:

P.O. Box 428  
Robertsdale, Alabama

JOHN P. BEEBE  
ATTORNEY AT LAW  
~~RECEIVED BY MAIL~~  
Robertsdale, Ala.

November 20th, 1959

Mrs. Alice J. Duck, Clerk,  
Circuit Court, Baldwin County,  
Bay Minette, Alabama.

Re: Nelson Radio & Supply Company vs. J. R. Mathews  
No. 4027

Dear Mrs. Duck:

I enclose answer of the defendant to be filed in the above  
entitled cause, in which I have requested a jury. I have also mailed  
to the attorneys of record for the plaintiff a copy of this answer.

Yours very truly,

*John P. Beebe*

NELSON RADIO & SUPPLY COMPANY, INC., A corporation,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA,
VS	)	AT LAW.
J. R. MATHEWS, Individually and Doing Business As Matthews Furniture Company,	)	CASE NO. <u>41027</u> .
Defendant.	)	

COUNT ONE: Plaintiff claims of the Defendant the sum of One Thousand Thirty-Eight and 46/100 (\$1,038.46) Dollars, due by promissory note made by him on the 10th day of December, 1958, and payable on the 25th day of June, 1959, with interest thereon.

Plaintiff further claims of the Defendant the sum of \$346.15, as attorney's fee which Plaintiff avers Defendant agreed to pay by the written provisions of said promissory note.

Plaintiff further avers that Defendant did by the terms of said promissory note waive all right of exemption under the Constitution and laws of the State of Alabama or any other State.

BRUTKIEWICZ & CRAIN

BY: Donald E. Brutkiewicz  
Attorneys for Plaintiff

Defendant's Address:

P.O. Box 428  
Robertsdale, Alabama



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4027

----- TERM, 19-----

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You Are Hereby Commanded to Summon J.R. MATTHEWS, Ind. & d/b/a MATTHEWS FURNITURE 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, State of Alabama, at Bay Minette, against-----

J.R. MATTHEWS, Ind. & d/b/a MATTHEWS FURNITURE CO.-----, Defendant-----

by NELSON RADIO & SUPPLY CO., Inc. a Corp.-----

-----, Plaintiff-----

Witness my hand this 27 day of October 1959

Alice J. Duck-----, Clerk

No. 4027 Page \_\_\_\_\_

**The State of Alabama**

Baldwin County

**CIRCUIT COURT**

NELSON RADIO & SUPPLY CO.,

Inc. a Corp.

Plaintiffs

vs.

J.R. MATTHRES, Ind. & d/b/a

MATTHEWS FURNITURE CO.

Defendants

**Summons and Complaint**

Filed October 27, 19 59

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

10/28 19 59

\_\_\_\_\_, Sheriff

I have executed this summons

this 10-30 19 59

by leaving a copy with

J. R. Matthews  
d/b/a  
Matthews Furn. Co.

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY 60  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edleigh Steadham Deputy Sheriff

Robertsdale, Ala