

4068

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon W. F. ANDERSON, d/b/a ANDERSON'S DEPARTMENT STORE, 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 NICKELS MANUFACTURING COMPANY, a Tennessee Partnership.

Witness my hand this the 25 day of November, 1959.

*W. F. Anderson*  
Clerk

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COMPLAINT

NICKELS MANUFACTURING COMPANY, )	
a Tennessee Partnership, )	
PLAINTIFF, )	IN THE CIRCUIT COURT OF
)	
VS: )	BALDWIN COUNTY, ALABAMA
)	
W. F. ANDERSON, d/b/a )	AT LAW
ANDERSON'S DEPARTMENT STORE, )	
DEFENDANT )	

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED ONE & 91/100 DOLLARS (\$201.91), due from him by account on, to wit: the 19th day of September, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED ONE & 91/100 DOLLARS (\$201.91), due from him on account stated between the plaintiff and the defendant on, to wit: the 19th day of September, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED ONE & 91/100 DOLLARS (\$201.91) due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 19th day of September, 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 12th day of November, 1959.

The defendant's address is:  
Foley, Alabama

*W. F. Anderson*  
Attorney for Plaintiff

FILED

NOV 25 1959

## STATEMENT

NICKELS MANUFACTURING CO.

BRISTOL, TENNESSEE

November 12, 1959

To Anderson's Dept. Store  
Foley, Alabama

KPCO.

1958

August

5

Invoice

85.70

Sept.

19

Invoice

116.21

201.91

COUNTY OF Sullivan

86-188 (13748)

STATE OF Tennessee

Be it remembered, that on this 12th day of November  
A. D., 19 59, personally appeared before me, the undersigned authority, J. W. Nickels  
122 Meadow Road, Bristol, Tennessee known to me  
who being duly sworn, upon his oath stated that he is Partner  
of Nickels Manufacturing Company  
{ a corporation organized and doing business under the laws of the State of  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of J. W. Nickels and W. W. Nickels  
a sole trader doing business as Dress Manufacturer  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said Nickels Manufacturing Company; that the attached account against  
Anderson's Department Store of Foley, 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 Anderson's Department Store  
at { ~~their~~ <sup>its</sup> } 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 Two hundred and one and 91/100 Dollars  
(\$ 201.91) with interest from 19 is justly due and  
remains unpaid.

J. W. Nickels - Partner X

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 Tennessee  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

J. Harold Peoples  
Notary Public

County of Sullivan State of Tennessee  
My commission expires 1-27 A. D. 19 60

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NICKELS MANUFACTURING COMPANY,  
A Tennessee Partnership,  
PLAINTIFF

VS:

W. F. ANDERSON, d/b/a ANDERSON'S  
DEPARTMENT STORE,  
DEFENDANT

Received, 30 day of Nov 1959  
and on 8 day of Dec 1959  
served a copy of the within W. F. Anderson

by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

Taylor Wilkins D. S.  
J. C. Wilkins

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY J. C. Wilkins  
DEPUTY SHERIFF

FILED

NOV 25 1959

ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA