

4069

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon WILLIAM FRANK 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 WASHINGTON MANUFACTURING COMPANY, a Tennessee Corporation.

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

Becky J. Alcock
Clerk

COMPLAINT

WASHINGTON MANUFACTURING)
COMPANY, a Tennessee)
Corporation,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS:) AT LAW
WILLIAM FRANK ANDERSON, d/b/a)
ANDERSON'S DEPARTMENT STORE,)
DEFENDANT)

COUNT I:

The plaintiff claims of the defendant ONE THOUSAND THIRTY-ONE & 00/100 DOLLARS (\$1,031.00), due from him by account on, to wit: the 10th day of December, 1958, which sum of money, with interest thereon is still unpaid.

COUNT II:

The plaintiff claims of the defendant ONE THOUSAND THIRTY-ONE & 00/100 DOLLARS (\$1,031.00), due from him on account stated between the plaintiff and the defendant on, to wit: the 10th day of December, 1958, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant ONE THOUSAND THIRTY-ONE & 00/100 DOLLARS (\$1,031.00), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 10th day of December, 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 13th day of November, 1959.

The defendant's address is:
Foley, Alabama

Walter C. ...
Attorney for Plaintiff



WASHINGTON

INVOICE
WASHINGTON MANUFACTURING CO., INC.
 NASHVILLE 3, TENN.

The Standard of the Industry

"MADE IN AMERICA BY AMERICANS"

THIS ACCOUNT IS ASSIGNED AND PAYABLE EXCLUSIVELY TO THE WASHINGTON SALES COMPANY, 224 2ND AVE., NORTH, NASHVILLE, TENN.

INVOICE

NUMBER DATE PAGE
 5128 11 18 58 1

SOLD TO
William Frank Anderson
Anderson's Department Store
Foley, Alabama

TERMS: NET 30 DAYS

1 1 59

ALL GOODS SOLD F.O.B. SHIPPING POINT

ACCOUNT NUMBER	CUSTOMER'S NUMBER	CO. LOC.	S. MAN	TYPE	BATCH	SEC	METHOD OF SHIPMENT		AMOUNT
			034	01	047	01	L N		
DESCRIPTION	LOT NUMBER		DOZENS	12THS	PRICE	CODE	DISC. RATE	DISC. AMOUNT	
PANTS	2492	N	4	4	36.00		.50	2.17	156.00
SHIRTS	1092	N	1	8	25.50		.50	.83	42.50
PANTS	316	7B N	1	6	30.00		.25	.38	45.00
PANTS	316	28B N	1	6	30.00		.25	.38	45.00
PANTS	316	7 N	4		36.00		.50	2.00	144.00
PANTS	316	28 N	4		36.00		.50	2.00	144.00
PANTS	303	17 N	4		36.00		.50	2.00	144.00
NET AMT								9.76	720.50

Based upon guaranty received, we guarantee that tests made, in accordance with the Flammable Fabrics Act, show that fabrics used in the garments covered by this invoice are not so highly flammable as to be dangerous when worn.

With respect to each and every item invoiced hereon to which the Federal Trade Commission rules for the rayon and acetate textile industry are applicable, the Seller hereby warrants that such item or items are plainly tagged or labeled or otherwise are plainly marked in strict conformity with said rules.

On parcel post shipments, the shipper is a self-insurer and responsibility is assumed for damage or loss in transit except when shipments are insured by the Post Office Department. On all other shipments, our responsibility ceases with delivery to carrier. All claims must be made within five days.

WASHINGTON
DEE-CEE



WASHINGTON

INVOICE
MANUFACTURING CO., INC.
 NASHVILLE 3, TENN.

The Standard of the Industry

"MADE IN AMERICA BY AMERICANS"

THIS ACCOUNT IS ASSIGNED AND PAYABLE EXCLUSIVELY TO THE WASHINGTON SALES COMPANY, 724 2ND AVE., NORTH, NASHVILLE, TENN.

INVOICE

NUMBER DATE PAGE

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 Anderson's Department Store 6496 12 09 58 1
 William Frank Anderson
 Foley, Alabama

TERMS: NET 30 DAYS

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ALL GOODS SOLD F.O.B. SHIPPING POINT

ACCOUNT NUMBER	CUSTOMER'S NUMBER	CO.	LOC.	S'MAN	TYPE	BATCH	SEQ.	METHOD OF SHIPMENT			AMOUNT
				034	01	065	01	D X MOH			
DESCRIPTION	LOT NUMBER	DOZENS		12THS	PRICE	CODE	DISC. RATE	DISC. AMOUNT			
SHIRTS	3 G	6			16.50					99.00	
SHIRTS	4 G	6			22.50					135.00	
NET AMT										234.00	

Based upon guaranty received, we guarantee that tests made, in accordance with the Flammable Fabrics Act, show that fabrics used in the garments covered by this invoice are not so highly flammable as to be dangerous when worn.

With respect to each and every item invoiced hereon to which the Federal Trade Commission rules for the rayon and acetate textile industry are applicable, the Seller hereby warrants that such item or items are plainly tagged or labeled or otherwise are plainly marked in strict conformity with said rules.

On parcel post shipments, the shipper is a self-insurer and responsibility is assumed for damage or loss in transit except where shipments are insured by the Post Office Department. On all other shipments, our responsibility ceases with delivery to carrier. All claims must be made within five days.





WASHINGTON MANUFACTURING CO., INC.

The Standard of the Industry

"MADE IN AMERICA BY AMERICANS"

INVOICE

NASHVILLE 3, TENN.

THIS ACCOUNT IS ASSIGNED AND PAYABLE EXCLUSIVELY TO THE WASHINGTON SALES COMPANY, 724 2ND AVE., NORTH, NASHVILLE, TENN.

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Anderson's Department Store
William Frank Anderson
Foley, Ala.

INVOICE
NUMBER 6497 DATE 12 | 10 | 58 PAGE 1

TERMS: NET 30 DAYS

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ALL GOODS SOLD F.O.B. SHIPPING POINT

ACCOUNT NUMBER	CUSTOMER'S NUMBER	CO.	LOC.	S'MAN	TYPE	BATCH	SEQ.	METHOD OF SHIPMENT	AMOUNT
				034	01	028	03	EXPRESS	
DESCRIPTION	LOT NUMBER		DOZENS	12THS	PRICE	CODE	DISC. RATE	DISC. AMOUNT	
BLOUSE	50	G	3		13.50		.50	1.50	40.50
BLOUSE	51	G	3		12.00		.50	1.50	36.00
NET AMT								3.00	76.50

Based upon guaranty received, we guarantee that tests made, in accordance with the Flammable Fabrics Act, show that fabrics used in the garments covered by this invoice are not so highly flammable as to be dangerous when worn.

With respect to each and every item invoiced hereon to which the Federal Trade Commission rules for the rayon and acetate textile industry are applicable, the Seller hereby warrants that such item or items are plainly tagged or labeled or otherwise are plainly marked in strict conformity with said rules.

On parcel post shipments, the shipper is a self-insurer and responsibility is assumed for damage or loss in transit except when shipments are insured by the Post Office Department. On all other shipments, our responsibility ceases with delivery to carrier. All claims must be made within five days.

WASHINGTON
DEE-CEE

STATE OF Tennessee

COUNTY OF Davidson

Before me, the undersigned authority in and for aforesaid county and state, as a notary public under my seal of office, which seal of office is hereto attached, personally appeared R. H. Dawson known to me, who being by me first duly sworn, deposed and upon his oath stated that he is Credit Manager of Washington Manufacturing Company, a corporation organized and doing business under the laws of Tennessee; a partnership composed of _____; a sole trader doing business as _____; that as such he makes this affidavit; that he is familiar with the books and business of Washington Manufacturing Company that the attached account against William Frank Anderson DBA Anderson's Department Store is just and correct, within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the items thereon stated and composing the said account were sold and delivered to the said William Frank Anderson DBA Anderson's Department Store the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of One Thousand Thirty-One and 00/100 Dollars (\$1,031.00) with interest from _____, 1959, is justly due and remains unpaid.

R. H. Dawson

Sworn to, subscribed, acknowledged, signed and sealed before me, as a notary public under my seal of office, with my seal hereto affixed on this the 13th day of November, 1959

Ruth M. Murtrie

A notary public in and for the
STATE OF Tennessee
COUNTY OF Davidson



100. #001
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

WASHINGTON MANUFACTURING COMPANY,
a Tennessee Corporation,
PLAINTIFF

VS:

WILLIAM FRANK ANDERSON, d/b/a
ANDERSON'S DEPARTMENT STORE,
DEFENDANT

17/8/59
by making copy of which defendant's wife
complains on

Wm Frank Anderson

Taylor Wilkins
Deputy Sheriff

Duck

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff

BY *[Signature]*
DEPUTY SHERIFF

FILED
NOV 25 1959
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA