

SUMMONS

4070

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon WILLIAM F. ANDERSON, doing business as Anderson Dept. 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 KAHN MFG. CO., INC., an Alabama Corporation.

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

Deirdre L. Buck
Clerk

COMPLAINT

KAHN MFG. CO., INC.,)	
an Alabama corporation,)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM F. ANDERSON, d/b/a)	AT LAW
ANDERSON DEPT. STORE,)	
DEFENDANT)	

COUNT I:

The plaintiff claims of the defendant SEVEN HUNDRED FIFTY & 00/100 DOLLARS (\$750.00) balance due from him by account on, to wit: the 3rd day of August, 1959, which sum of money, with interest thereon is still unpaid.

COUNT II:

The plaintiff claims of the defendant SEVEN HUNDRED FIFTY & 00/100 DOLLARS (\$750.00) balance due from him on account stated between the plaintiff and the defendant on, to wit: the 3rd day of August, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant SEVEN HUNDRED FIFTY & 00/100 DOLLARS (\$750.00) balance due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 3rd day of August, 1959, 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 3rd day of August, 1959.

The defendant's address is:
Foley, Alabama

Spencer C. Clum
Attorney for Plaintiff

STATEMENT

MAKERS OF QUALITY GARMENTS
SINCE 1907

MANUFACTURING CO., INC.

P. O. BOX 947

MOBILE, ALABAMA 8/3/59

- Anderson-John, 10000,
- Anderson,
- Anderson,

TERMS: NET 30 DAYS
WHEN REMITTING PLEASE LIST INVOICES BEING PAID.

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
PREVIOUS MONTH'S BALANCE				
1957				
10/9		105.00		
12/3				
1/30		957.75		
4/11		15.46		
4/18		312.00		
5/2		227.50		
5/7		191.38		732.50
12/31				
1/31			136.45	
4/7			139.79	686.32
				1,016.35
				1,150.39

Please compare with your account and advise at once of any difference
All charges not appearing on this statement will be shown on next month's statement

STATE OF _____

COUNTY OF MOBILE

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 Richard L. Smith known to me, who being by me first duly sworn, deposed and upon his oath stated that he is Controller of Kahn Mfg. Co. Inc., a corporation organized and doing business under the laws of Alabama; 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 Kahn Mfg. Co. Inc. that the attached account against Anderson 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 Anderson Dept. Store at 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 1,150.30 dollars (\$ 1,150.30 with interest from _____, 19____, is justly due and remains unpaid.

Richard L. Smith

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 3rd day of August, 1959

A notary public in and for the

STATE OF Alabama

COUNTY OF Mobile

TROUSERS and SPORTSWEAR

By

KAHN
MAN
P.



MAKERS OF QUALITY GARMENTS
SINCE 1907

MANUFACTURING CO., INC.

P. O. BOX 947

MOBILE, ALABAMA

SHIP
TO

SOLD
TO

ETO

TERMS: 30 DAYS NET

SALESMAN

LOT	PRICE
1	1.00
2	1.00
3	1.00
4	1.00
5	1.00
6	1.00
7	1.00
8	1.00
9	1.00
10	1.00
11	1.00
12	1.00
13	1.00
14	1.00
15	1.00
16	1.00
17	1.00
18	1.00
19	1.00
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47	1.00
48	1.00
49	1.00
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85	1.00
86	1.00
87	1.00
88	1.00
89	1.00
90	1.00
91	1.00
92	1.00
93	1.00
94	1.00
95	1.00
96	1.00
97	1.00
98	1.00
99	1.00
100	1.00

COMPLETE

BAL. TO FOLLOW

NO CARBON REQUIRED—MOORE BUSINESS FORMS, INC.; DENTON, TEXAS—PAPER PAT. BY H.C.Z. CO.

By



KAHN
MANUFACTURING
P.



MANUFACTURING CO., INC.

P O BOX 947

MOBILE, ALABAMA

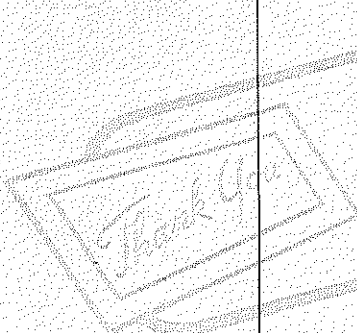
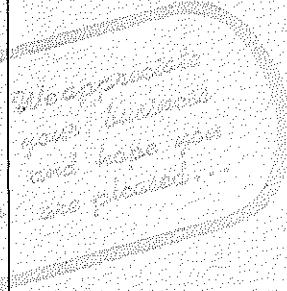
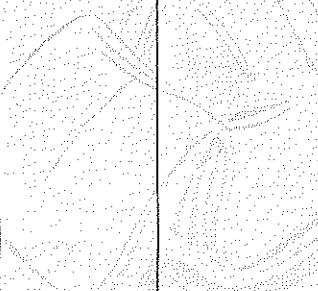

SHIP
TO

SOLD
TO

[illegible]

TERMS: 30 DAYS NET

SALESMAN

LOT		PRICE	
			

COMPLETE ☐

BAL TO FOLLOW ☐

TROUSERS and SPORTSWEAR

By



MAKERS OF QUALITY GARMENTS
SINCE 1907

MANUFACTURING CO., INC.

P. O. BOX 947

MOBILE, ALABAMA

SHIP
TO

4/18/42

Anderson Dept. Store
Tulsa, Okla.

SOLD
TO

TERMS: 30 DAYS NET

SALESMAN

LOT			PRICE	
343-5	10	Pants	5.25	52.50
343-2	10		5.25	52.50
377-1	7		6.00	42.00
320-1	7		5.00	35.00
320-3	7		5.00	35.00
435-2	8		5.50	44.00
345-2	2		5.25	10.50
345-2	6		5.25	31.50
<p>Thank You</p> <p>We appreciate your business and hope you are pleased.</p>				317.00

COMPLETE

☐

BAL. TO FOLLOW

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TROUSERS and SPORTSWEAR

By

KAHN



MAKERS OF QUALITY GARMENTS
SINCE 1907

MANUFACTURING CO., INC.

P. O. BOX 947

MOBILE, ALABAMA

SHIP
TO

5/1/58

SOLD
TO

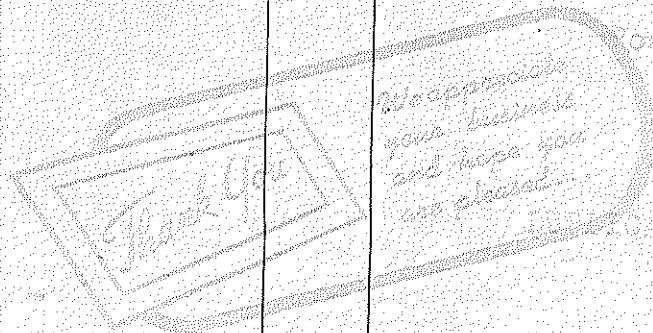
Anderson Dev. Store,
Poley, Ala.

TERMS: 30 DAYS NET

SALESMAN

Bornheim

LOT			PRICE		
342-3	10	Pants	5.50	55.00	
342-3	10	"	5.50	55.00	
4342-0	6	"	5.50	33.00	
365-0	6	"	4.25	25.50	
365-3	4	"	4.75	19.00	
365-6	8	"	4.75	38.00	
3345-0	6	"	5.25	31.50	225.50
Postage & Ins					7.20
					237.70



COMPLETE

☐

BAL TO FOLLOW

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NO CARBON REQUIRED—MOORE BUSINESS FORMS, INC., DENTON, TEXAS—PAPER PAT. BY M.C. CO.

TROUSERS and SPORTSWEAR

By

KAHN



MAKERS OF QUALITY GARMENTS
SINCE 1907

MANUFACTURING CO., INC.

P. O. BOX 947

MOBILE, ALABAMA

SHIP
TO

5/6/38

SOLD
TO

Anderson's Dept. Store,
Poley, Ala.

TERMS: 30 DAYS NET

LOT	SALESMAN	PRICE
341-0		14.00
341-3		15.00
341-6		14.50
		303.50
		7.09
		304.59

Thank You

We appreciate
your business
and hope you
are pleased.

COMPLETE

☐

BAL. TO FOLLOW

☐

NO CARRON REQUIRED—MOORE BUSINESS FORMS, INC., DENTON, TEXAS—PAPER PAT. BY M.C.B. CO.

100.4010

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

KAHN MFG. CO., INC., an Alabama
Corporation,
PLAINTIFF

VS:

WILLIAM F. ANDERSON, d/b/a
ANDERSON DEPT. STORE,
DEFENDANT

Received 25 day of Nov. 1909
and on 31 day of Nov 1909
I served a copy of the within
on William F. Anderson

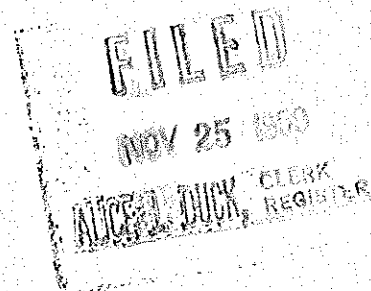
By service on _____

TAYLOR WILKINS, Sheriff

By W. C. Wilkey D. S.

W. C. Wilkey

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



LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA