

4088

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 WILLIAM ISELIN & CO INC., a New York Corporation.

Witness my hand this the 3 day of December, 1959.

Alice J. Duck
Clerk

EX 12-8-59

COMPLAINT

WILLIAM ISELIN & CO INC.,)	
a New York Corporation,)	
PLAINTIFF,)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM FRANK ANDERSON, d/b/a)	AT LAW
ANDERSON'S DEPARTMENT STORE,)	
DEFENDANT.)	

COUNT I:

The plaintiff claims of the defendant TWO THOUSAND FIVE HUNDRED TWENTY & 69/100 DOLLARS (\$2,520.69), due from him by account on, to wit: the 10th day of July, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO THOUSAND FIVE HUNDRED TWENTY & 69/100 DOLLARS (\$2,520.69), due from him on account stated between the plaintiff and the defendant on, to wit: the 10th day of July, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO THOUSAND FIVE HUNDRED TWENTY & 69/100 DOLLARS (\$2,520.69), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 10th day of July, 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 16th day of November, 1959.

The Defendant's address is:
Foley, Alabama

Paul H. Clark
Attorney for Plaintiff

FILED
DEC 3 1959
ALICE J. DUCK, CLERK
REGISTER

PROOF OF CLAIM

State of NEW YORK

County of NEW YORK

ss

I, ROBERT T. WELER

, being first duly sworn, depose and state that:

1. I am engaged in business under the name and style _____

2. I am a partner in the firm of _____

(Fill in names of Partners)

doing business as _____

3. I am ASS'T VICE PRESIDENT

of the WILLIAM ISELIN & CO INC.

a corporation incorporated under the laws of the state of NEW YORK and that the annexed

bill of particulars is a true and correct copy of the account due WILLIAM ISELIN & CO., INC.

and against ANDERSONS

and that the items of debit and credit therein contained, are to my personal knowledge true and correct, and that, after allowing all just credits

and set-offs, there is justly due and unpaid thereon the amount of \$ 2,520.69 with legal interest to date.

Subscribed and sworn to before me this

16th day of NOVEMBER 19 59

Edward Mulligan Notary Public.

57643M — EDWARD MULLIGAN
NOTARY PUBLIC, State of New York
No. 30-2811590
Qualified in Westchester County
Commission Expires March 30, 1963

COURT _____

COUNTY _____

STATE _____

~~WILLIAM IGELIN & CO., INC.~~

VS.

~~ANDERSONS~~

PROOF OF CLAIM

Amount of Claim - - - - - \$ 2,520.69

Amount of Interest - - - - - \$ _____

Total - - - - - \$ _____

Attorney for Plaintiff

FROM

FURST AND FURST

Commercial Collections Everywhere

228 N. LaSalle Street

CHICAGO

Received 3 day of Dec 1959
and on 8 day of Dec 1959
I served a copy of the within A & C
on Wm. Frank Anderson

By service on _____

TAYLOR WILKINS, Sheriff
Archie Dickens D. S.

Foley

Sheriff claims 72 miles at

Ten Cents per mile Total 7.20

TAYLOR WILKINS, Sheriff

BY CC
DEPUTY SHERIFF

4760
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

WILLIAM ISELIN & CO. INC. d/b/a
New York Corporation,
PLAINTIFF,

VS:

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

FILED

DEC 3 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA