#### SUMMONS



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's 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 CARTER DRY GOODS CO., a Kentucky Corporation.

#### COUNT I:

The plaintiff claims of the defendant SIX HUNDRED NINETY & 95/100 DOLLARS (\$690.95), due from him by account on, to wit: the 30th day of October, 1959, which sum of money, with interest thereon, is still unpaid.

#### COUNT II:

The plaintiff claims of the defendant SIX HUNDRED NINETY & 95/100 DOLLARS (\$690.95), due from on account stated between the plaintiff and the defendant on, to wit: the 30th day of October, 1959, which sum of money, with interest thereon, is still unpaid.

#### COUNT III:

The plaintiff claims of the defendant SIX HUNDRED NINETY & 95/100 DOLLARS (\$690.95), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 30th day of October, 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 13th day of September, 1960.

The defendant's address is: Foley, Alabama

Attorney for Plaintiff

## CARTER DRY GOODS COMPAN

727 TO 741 W. MAIN ST.

LOUISVILLE 2, KEN

PHONE JUniper 4-8311

2010 ANDERSON DEPT STORE FOLEY ALA

DUR ORDER NUMBER:		YOUR ORDE	R NUMBER: 3459	GOODS SHIPPED E		NO ANTICI	
DEPT.	DESCRIPTION		STOCK NO.				
			STOCK NO.	PRICE	QUANTITY	Material State of Control of Cont	
	LA PANTIES LA PANTIES PANTIES PANTIES LA PETTICOATS LA COTTON SLIP LA SLIPS LA SLIPS LA SLIPS SLIPS LA GOWNS LA GOWNS MAXM MATCHED SI LA GOWNS	PS	\$ 695 677 301 1540 1530 78000 1054 1011 1006 T 1020 1030 2233 2033 2833-2533 481	12 00 13 50 6 25 22 50 30 75 30 75 30 75 36 00 45 00 30 75 36 00 87 00 22 50	1 4 1, 3, 3, 1 1, 1 3, 2		
	STYLE 701 DISC STYLE 1021 OUT STYLE 1030 IS P SHIPPED FROM MI	ACK BD	CK SUB 1020 2-12 PER BO	<b>X</b>	DUPLICATE INV	C.	

IMPORTANT All orders and contracts accepted are contingent upon strikes, delays or damages by carriers, and other delays unavoidable or beyond our All promises of shipment are as closely estimated as possible. We use our best efforts in every case to ship within the time promised but cannot guaran as goods are delivered in good order and condition at shipping point and a receipt therefor taken, we as senders, having no legal claim after goods are delivered. Claims for errors must be made upon receipt of goods.

When shipments are received short or damaged it should be stated on your freight receipt for your own protection.

COUNTY OF Jefferson
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
W. R. Falkenburg known to me, who being by me first duly
sworn, deposed and upon his oath stated that he is Vice President
of
business under the laws of Kentucky; 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 <u>Carter Dry Goods Co.</u> that the attached account
against Anderson's Dept. 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 's 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 ofDollars (\$690.95) with
interest from XNOXXX Dec 1 , 19 59 is justly due and remains
unpaid.
A State of the second of the s
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
A metowy muhling in and for the
A notary public in and for the
STATE OF Kentucky COUNTY OF Jefferson

STATE OF Kentucky

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA

by sarving copy of within Summons and Sheriff claims 22 miles at Ten Cents pur mile Total \$

no. 4440

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

CARTER DRY GOODS CO., a Kentucky Corporation, PLAINTIFF

VS:

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

OCT A 1980
MILE L MICK, RESSIER

FOREST A. CHRISTIAN FOLEY, ALABAMA

### STATEMENT OF ACCOUNT

# CARTER DRY GOODS CO.

LOUISVILLE 2, KY.

Anderson's Dept. Store Foley,

INTEREST CHARGED ON BILLS AFTER DUE								
DATE		TERMS	CHARGES	CREDITS	PAY LAST AMOUNT IN THIS COLUMN			
Oct 3	10 59	Nt30	690.95		690.95			