

SUMMONS

4508

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 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 BAY SHOE COMPANY, INC., a Louisiana corporation.

Witness my hand this the 6 day of December, 1960.

Reinhold Neuch
Clerk

* * * * *

COMPLAINT

BAY SHOE COMPANY, INC., a)
Louisiana corporation,)
) PLAINTIFF)
VS:)
WILLIAM F. ANDERSON, d/b/a)
Anderson's Department Store)
) DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant SEVEN HUNDRED SEVENTY-ONE & 39/100 DOLLARS (\$771.39), due from him by account on, to wit: 2nd day of December, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant SEVEN HUNDRED SEVENTY-ONE & 39/100 DOLLARS (\$771.39), due from him on account stated between the plaintiff and the defendant on, to wit: the 2nd day of December, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant SEVEN HUNDRED SEVENTY-ONE & 39/100 DOLLARS (\$771.39), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 2nd day of December, 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 30th day of November, 1960.

The defendant's address is:
Foley, Alabama

John C. ...
Attorney for Plaintiff

Bay

STATEMENT

SHOE COMPANY, INC.

525 Iberville Street


New Orleans 16, La.

W. F. ANDERSON
ANDERSON'S DEPARTMENT STORE
FOLEY, ALABAMA

1959	AUG21	228.20
"	SEP30	159.70
"	OCT30	355.70
"	DEC 2	27.79
		771.39*

Certified to be a true and correct statement of account,
payment for which has not been received.

BAY SHOE COMPANY, INC.


M. K. Friedman, Treasurer

MEN'S BOYS' LADIES' AND CHILDREN'S SHOES

MEN'S ETONIAN SHOES

PARIS PRIDE FOOTWEAR

THE STATE OF LOUISIANA

PARISH OF ORLEANS

Before me, the undersigned Notary Public, within and for the Parish and State aforesaid, on this day personally appeared M. K. Friedman

known to me who, being by me duly sworn, states on oath that the foregoing and annexed account in favor of Bay Shoe Company, Inc., 525 Iberville Street, New Orleans, La.

*which is a corporation organized and existing under the laws of the State of Louisiana

and of which corporation affiant is the authorized Treasurer
Agent, Attorney, President or Secretary

(or) *which is a co-partnership consisting of _____

_____ and of which co-partnership affiant is _____
Member, Agent or Attorney

And which account is against W. F. Anderson, Anderson's Department Store

for the sum of seven hundred seventy one and 39/100 - - - - - Dollars

is within the knowledge of affiant, just and true; that it is due and unpaid, and that all just and lawful offsets, payments and credits have been allowed.

M. K. Friedman

Sworn to and subscribed before me, the 30th day of November A. D., 19 60

[Signature]
Notary Public

*ERASE ACCORDING TO FACTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

RAY SHOE COMPANY, INC., a
Louisiana corporation,

PLAINTIFF

VS:

WILLIAM F. ANDERSON, d/b/a
Anderson's Department Store,

DEFENDANT

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

FILED
DEC 6 1960
ALICE J. DUCK, CLERK
REGISTER

Received
6 day of Dec 1960
28 day of Dec 1960
gave a copy of the within
William F. Anderson

TAYLOR WILKINS, Sheriff
D. S.

90101

Sheriff claims 72
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF