

ST. CROIX SALES CORPORATION  
a corporation

Plaintiff

vs

DAVID D. JAYE, Individually  
and doing business as ROCK  
HILL SERVICE CENTER

Defendant

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the defendant and for answer to the complaint filed in  
said cause and to each count thereof separately and severally shows  
as follows:

-1-

As to Count I, he denies the allegations of said complaint.

-2-

As to Count II, he denies the allegations of said complaint.

-3-

As to Count III he denies the allegations of said complaint.

THOMPSON & WHITE

BY:

*C. L. D. Thompson*  
Attorneys for Defendant

Defendant respectfully requests trial by jury.

THOMPSON & WHITE

BY:

*C. L. D. Thompson*  
Attorneys for Defendant

FILED

SEP 26 1980

ALICE J. DUCK, CLERK  
REGISTER

ST. CROIX SALES CORPORATION,  
A corporation

Plaintiff

VS

DAVID D. JAYE, Individually  
and doing business as ROCK  
HILL SERVICE CENTER

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

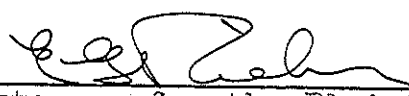
The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY-ONE and 32/100 (\$191.32) Dollars due from him by account on, to-wit, the 15th day of December, 1958; which sum of money with the interest thereon is still unpaid.

COUNT II

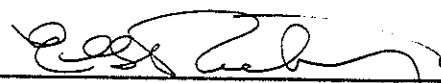
The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY-ONE and 32/100 (\$191.32) Dollars due from him for merchandise and goods sold by the Plaintiff to the Defendant on, to-wit, the 15th day of December, 1958; which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of ONE HUNDRED NINETY-ONE and 32/100 (\$191.32) Dollars due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 15th day of December, 1958; which sum of money with the interest thereon is still unpaid.

  
Attorney for the Plaintiff

NOTE: The account sued on is evidenced by an itemized and verified state ment of account filed herewith.

  
Attorney for the Plaintiff

## STATEMENT

## ST. CROIX SALES CORPORATION

SOLE DISTRIBUTORS OF

WORLD FAMOUS  FISHING TACKLE

PARK FALLS, WISCONSIN

- ROCK HILL SERVICE CENTER
- Highway 31 - N
- Bay Minette, Alabama

PLEASE RETURN THIS STUB WITH YOUR CHECK. AMOUNT ENCLOSED \$ \_\_\_\_\_

DATE	REFERENCE	CHARGES	CREDITS	BALANCE
BALANCE FORWARDED				0.00
Oct. 23 <sup>1</sup> 58	11981	30.96		
Oct. 27 <sup>1</sup> 58	11,982	39.53		
Oct. 27 <sup>1</sup> 58	11,983	22.12		
Oct. 27 <sup>1</sup> 58	11,984	36.90		
Nov. 10 <sup>1</sup> 58	12,890	29.88		
Nov. 21 <sup>1</sup> 58	13,611	21.29		
Dec. 11 <sup>1</sup> 58	14,051	7.96		
Dec. 15 <sup>1</sup> 58	14,757	2.68		
				<del>\$191.32</del> \$191.32

ST. CROIX SALES CORPORATION

PARK FALLS, WISCONSIN

STAMBEAU COMPANY

No.

K-1477

WORLD FAMOUS **STAMBEAU** FISHING TACKLE — PARK FALLS, WISCONSIN

Book 12.12 BATTLES GAMES  
Hobby 12.12  
My Master, Master

12-15-58

SOLD  
TO

VIA

SALESMAN *John* C. D. OPEN ☐

12-15-58  
CITY FOR SHIPMENT  
ORDER DATE  
YOUR CREDIT NO.  
Park Falls, Wisc. ☐ ☒ *12-15-58*  
DESTINATION ☐

QUANTITY ORDERED	BACK ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION	CUST. NO.	SUGGESTED LIST	YOUR COST	AMOUNT
1		1	200	1000 Tackle			2.68	2.68
<i>John</i> <i>12-15-58</i> <i>W.C. Miller</i>								

TOTAL UNITS *1* NO. OF BOXES  
NO. OF BUNDLES  
VIA *PP*  
TIME SHIPPED *12-15-58* BY *NR*

WORLD FAMOUS **3-30-02** FISHING Tackle ——— BAIT, FLY, & JUNK

ORDER FROM THE AMERICAN FISHING TACKLE CO.

12-1-58  
12-1-58

SOLD TO

VIA

DATE SHIPPED		ACK. FOR PAYMENT		ORDER DATE	YOUR ORDER NO.	POST. PAID, VISA	DISTINCTION	RET. IN DAYS	
12-1-58						8.00			
QUANTITY ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION			COST NO.	SUGGESTED LIST	YOUR COST	AMOUNT
2	2	40	1/2 Fly					1.00	1.96
1	1	400	1/2 Worming					1.00	7.96
1.96									
7.96									

*Handwritten signature/initials*

TOTAL UNITS

2

NO. OF BOXES

NO. OF RUNDLES

TIME SHIPPED

12-1-58

408

DE

# FLAMBEAU CORPORATION

No.

5-13610

WORLD FAMOUS **FLAMBEAU** FISHING TACKLE

OFFICE NO.

PARK FALLS, WISCONSIN

1000 West 2nd St. Phone 1-1473

TO **Mr. J. H. H.**  
**My Mother, Atlanta.**

VIA

DATE SHIPPED

11-21-58

ACK. FOR SHIPMENT

Signature

ORDER DATE

11/21/58

SALESMAN **W. H. H.**

YOUR ORDER NO.

C ☐

OPEN ☐

FOB

Park Falls, Wisc. ☐

DESTINATION ☐

PAID BY **Mr. J. H. H.**

QUANTITY ORDERED	BACK ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION	CUST. NO.	SUGGESTED LIST	YOUR COST	AMOUNT
1		1	4	4' cork 2-1/2" and 6' cork 2-1/2"				5.94
1		1	6	6' cork 2-1/2" and 6' cork 2-1/2" 1/2" on				4.05
1		12	#3	2-1/2" and 2-1/2"				2.34
2	2		371	11' 1/2" cork				3.96
2		2	372	11' 1/2" cork				3.96
								21.29

TOTAL UNITS

NO. OF BUNDLES

NO. OF BOXES

VIA

BY

TIME SHIPPED

11-21-58

PP  
H.R.

1-16



# FRAN BEAU CORPORATION

No.

10-17-51

SOLE DISTRIBUTORS OF

DEALER NO.

WORLD FAMOUS **Micro** FISHING TACKLE — PARK FALLS, WISCONSIN

SOLD TO

Frank Hill Service Center  
Highway 1 St. E.  
Ray, Minnesota, Minn.

*Handwritten signature*

VIA

CALCULATED

C.D.

OPEN D

DATE SHIPPED

CHK. FOR SHIPMENT

ORDER DATE

YOUR ORDER NO.

F.O.B.

Park Falls, Wisc.

TERMS

DESTINATION

10-27-51

10-27-51

10-27-51

QUANTITY ORDERED	BACK ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION	COST NO.	SUGGESTED LIST	YOUR COST	AMOUNT
1 each		2	1001	1/2" Fly net			1.78	3.56
6 each		6	1002	1/2" Fly net			1.78	10.68
1 each	1	1	1003	1/2" Fly net			1.78	1.78
1 each		1	1004	1/2" Fly net			1.78	1.78
1 each	2	2	1005	1/2" Fly net			1.78	3.56
1 each	2	2	1006	1/2" Fly net			1.78	3.56
1 each	2	2	1007	1/2" Fly net			1.78	3.56
1 each		2	1008	1/2" Fly net			1.78	3.56
1 each	1	1	1009	1/2" Fly net			1.78	1.78
1 each	2	2	1010	1/2" Fly net			1.78	3.56

TOTAL UNITS

NO. OF BOXES

22.02

NO. OF BUNDLES

TIME SHIPPED

22.02



W

Figure 1

050020

WORLD FAMOUS **WILD OX** FISHING TACCAH ————— PARK FALLS, WISCONSIN

Name: WILLIAM JAMES  
 Room # 32 - Box  
 Date February 1964

02/25/2017 20:06:00

06-03575

## DATA ANALYSIS

\* SEC. 303. (a) (1) The following shall be the members of the board:

$$\frac{1}{2} \left( \frac{1}{2} \right)^2 = \frac{1}{2} \cdot \frac{1}{2} = \frac{1}{4}$$

2007

*Journal of Management Education* 30(6)p. 789-804  
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1992

[illegible]

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total votes

NO. OF BOXES

NO. OF PAGES: 24

12/11/2014

## TIME SHIPPED

WNY

# LEAMBEAU CORPORATION

No. 4-1192

SOLE DISTRIBUTORS OF OFFICE NO. 1  
WORLD FAMOUS **SEACROFT** FISHING TACKLE ——— PARK FALLS, WISCONSIN

SOLD TO **Wm. H. Hartman, Owner**  
**Wm. H. Hartman**  
**Ray, Minnesota**

*[Handwritten signature]*

DATE SHIPPED	QTY. FOR SHIPMENT	ORDER DATE	YOUR ORDER NO.	F.O.B.	Part Paid, Winc.	DISTRIBUTION	C	OPEN
10-23-58	1000	10/23/58	1000					
QUANTITY ORDERED	EACH ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION	CUST. NO.	SUGGESTED LIST	YOUR COST	AMOUNT
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	3.29
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	2.13
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	2.67
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	4.00
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	4.80
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	3.38
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	1.90
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	3.92
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	4.40
1 each		1 ea	1000	Light Tackle (1 ea)		1.00	1.00	3.96

TOTAL UNITS \_\_\_\_\_ NO. OF BOXES \_\_\_\_\_  
 NO. OF BUNDLES \_\_\_\_\_  
 TIME SHIPPED \_\_\_\_\_ BY **DL**



WORLD FAMOUS **SECOX** FISHING TACKLE ——— PARK FALLS, WISCONSIN

SOLD TO **John H. Hurler**  
**Thorp, N. D.**  
**Big Lake, Minn.**

VIA **10-27-58** SALESMAN **W. H. H.** C. F. OPEN ☐

DATE SHIPPED	QUANTITY ORDERED	QUANTITY SHIPPED	CATALOG NO.	DESCRIPTION	CUST. NO.	SUGGESTED LIST	YOUR COST	AMOUNT
10-27-58	1	1	100	1/2' Casting Rod			2.48	
	1	1	100	1/2' Fly rod			1.00	8.08
	1	1	100	1/2' Casting 1/2" rod			1.32	7.32
	2	2	100	1/2' Casting Rod			1.46	
	2	2	100-1-2	1/2' Casting Rod			2.68	5.36
	1	1	100-2-2	1/2' Casting Rod			2.58	3.58
	1	1	100-3-2	1/2' Casting Rod			4.30	4.48
	1	1	100	1/2' Fly rod			2.00	8.08
								91.90

TOTAL UNITS

NO. OF BOXES

NO. OF BUNDLES

VIA

TIME SHIPPED

BY

# Affidavit to Claim

STATE OF WISCONSIN  
COUNTY OF PRICE } ss.

Before me, the undersigned, a Notary Public, in and for the County and State aforesaid, personally appeared W. D. JOHNSON who

being by me first duly sworn according to law, deposes and says that he is\* TREASURER

of ST. CROIX SALES CORPORATION of Park Falls, Wisconsin

1. A corporation organized and doing business under the laws of the State of WISCONSIN
2. A partnership composed of \_\_\_\_\_
3. A sole trader doing business as \_\_\_\_\_

and that as such he is authorized to make this affidavit; cognizant of the facts constituting the cause of action; that he is familiar with the books and business of said ST. CROIX SALES CORPORATION

that the account against ROCK HILL SERVICE CENTER of BAY MINETTE, ALABAMA hereto attached, marked "Exhibit A" and made a part hereof

is a true and correct copy of books of original entry, instrument of writing or claim, on which this action is brought, of ST. CROIX SALES CORPORATION; that the goods for which said

charges were made were sold and delivered to the said ROCK HILL SERVICE CENTER at HIS special instance and request; that the charges made therefor are fair and reasonable and as per

contract, and that he promised to pay the sums charged; that credit has been duly given for all payments, counter claims and setoffs and that there is no usury therein; that said ST. CROIX SALES CORPORATION

has no collateral or other security for the payment thereof and that there now remains due and owing from said ROCK HILL SERVICE CENTER to ST. CROIX SALES CORPORATION

the sum of ONE HUNDRED NINETY-ONE and 32/100 \* - - - - - Dollars, together with interest thereon from \_\_\_\_\_ 19\_\_\_\_

Subscribed and sworn to before me this 15<sup>th</sup> day of July 1960

W. D. Johnson L. S.

W. D. Johnson Notary Public  
My commission expires 2/12/62  
\*Treasurer, Member of Firm or Sole Proprietor.

## POWER OF ATTORNEY

To AMERICAN CREDIT INDEMNITY COMPANY of New York

or \_\_\_\_\_  
You or your representative endorsed hereon, are hereby appointed the attorney-in-fact for the undersigned, and each or either of you is authorized to attend any and all meetings of creditors or adjourned meetings of creditors of the above named debtor in any court or elsewhere, and for the undersigned to vote for or against any proposal or resolution that may be submitted in reference to the affairs or estate of the above named debtor; to accept or refuse any composition in or out of bankruptcy proposed by said debtor or his or its representatives; to receive, endorse, receipt for and collect any payments of dividends or fees or moneys due the undersigned under any composition or otherwise and in general to take such action and do such acts, execute such consents for the undersigned as you may deem best, as fully as the undersigned could do if personally present. And all powers of attorney heretofore executed by the undersigned in this proceeding are hereby revoked.

In Witness Whereof, the above named claimant has signed these presents or has caused them to be signed and its corporate seal affixed this FIFTEENTH day of JULY 19 60

(Corp. Seal.)

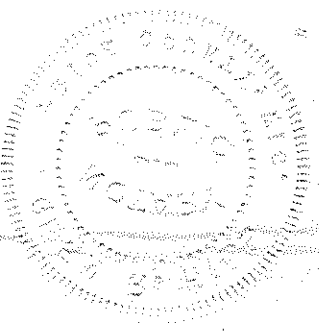
ST. CROIX SALES CORPORATION

(Corporate or partnership name here)

W. D. Johnson L. S.  
(Name of officer, partner or individual here)

150

Claimant	Against	Debtor
Affidavit to Claim		
American Credit Indemnity Co. of New York		



FOR INDIVIDUAL

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally came \_\_\_\_\_, to me known and known to me to be the individual described in and who executed the foregoing instrument and he duly acknowledged to me that he executed the same.

SS: \_\_\_\_\_

CITY OF \_\_\_\_\_  
STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

(Notary Public signs here)

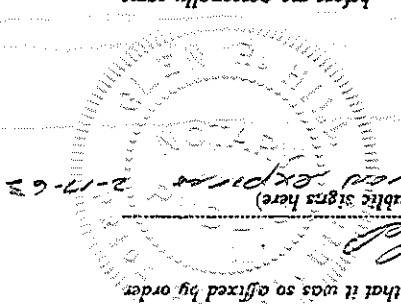
FOR PARTNERSHIP

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally came \_\_\_\_\_, to me known and known to me to be one of the persons described in and who executed the foregoing instrument and who duly acknowledged that he executed the same, and who being by me duly sworn, did depose and say that he is a member of said partnership and is duly authorized to execute same on behalf of his said firm.

SS: \_\_\_\_\_

CITY OF \_\_\_\_\_  
STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

(Notary Public signs here)



FOR CORPORATION

On this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, before me personally came \_\_\_\_\_, to me known, who being by me duly sworn, did depose and say that he resides in \_\_\_\_\_, Park Falls, Wisconsin, \_\_\_\_\_, that he is the \_\_\_\_\_, TREASURER of the \_\_\_\_\_, ST. CROIX SALES CORPORATION, the corporation described in and which executed the above instrument; that he knew the seal of said corporation; that the seal affixed to said instrument was such corporate seal; that it was so affixed by order of the board of directors of said corporation, and that he signed his name thereto by like order.

SS: \_\_\_\_\_

CITY OF \_\_\_\_\_  
STATE OF \_\_\_\_\_  
COUNTY OF \_\_\_\_\_

W.D. JOHNSON  
PRICE  
WISCONSIN  
PARK FALLS

(Notary Public signs here)

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon DAVID D. JAYE, Individually and doing business

as ROCK HILL SERVICE CENTER

Bay Minette, Alabama

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, State of Alabama, at Bay Minette, against DAVID D. JAYE,

Ind. and d/b/a ROCK HILL SERVICE CENTER Defendant-----

by ST. CROIX SALES CORPORATION, a Corporation

-----, Plaintiff-----

Witness my hand this 12 day of Aug 1960

Archie. Black, Clerk

ST. CROIX SALES CORPORATION,  
a corporation

Plaintiff

vs

DAVID D. JAYE, Individually  
and doing business as ROCK  
HILL SERVICE CENTER

Defendant

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

TO THE HONORABLE H. M. HALL JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA:

Now comes the Defendant, David Jaye, in the above stated cause,  
by Thompson & White his attorneys of record and moves the court to re-  
quire the Plaintiff to give security for costs and as ground for said  
motion sets down and assigns, separately and severally, the following:

-1-

For that the Plaintiff is a nonresident of the State of  
Alabama, and was a nonresident of said state at the time said original  
bill was filed.

THOMPSON & WHITE

BY:

*C. L. Davis Thompson*  
Attorneys for Plaintiff

**FILED**

AUG 25 1960

AUGUST J. DUCK, CLERK  
REGISTER

**E. G. RICKARBY**

392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

August 5, 1960

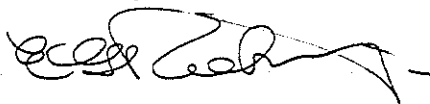
Mrs. Alice Duck  
Clerk of Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

RE: St. Croix Sales Corp.  
VS: Rock Hill Service Center,  
Bay Minette, Alabama  
Our File: 4998

Enclosed find Summons and Complaint in the  
above mentioned cause. Also find deposit  
for costs in the sum of \$15.00. Please  
process and oblige.

Yours very truly,



EGR/wr

Enc:

cc: (dup) Client



Otto Schoen,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
Vs	)	AT LAW
Freeman Watson and	)	
K. P. Mitchell,	)	
jointly and individually	)	
Defendants	)	

I

Plaintiff claims of the Defendants the sum of Ten Thousand and No/100 (\$10,000.00) Dollars as damages, for that heretofore on, to wit, the 23rd day of April, 1958, the Defendant Freeman Watson, while acting within the line and scope of his employment as agent, servant or employee of the Defendant K. P. Mitchell, so negligently operated a motor vehicle northwardly on Alabama Highway #59, a public highway, at a point 3.5 miles north of the corporate limits of Foley, in Baldwin County, Alabama, by parking same in the right traffic lane of said highway, without lights or flares of warning, during darkness, so that the Plaintiff, operating his motor vehicle northwardly on said highway, ran upon and onto the said vehicle parked by the Defendant Freeman Watson, while acting within the line and scope of his employment as agent, servant, or employee of the Defendant K. P. Mitchell, the plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical pain and mental anguish, the plaintiff's spine was injured, plaintiff's automobile was greatly damaged, and plaintiff was caused to incur expenses of doctors, x-rays, chiropractors and drugs in and about the care and treatment of his injuries as aforesaid, and will likely incur additional expenses of like nature in the future, all to plaintiffs' injury, hence this suit.

  
Attorney for Plaintiff