

THE UPJOHN COMPANY Memphis,
Tennessee Branch, a corpor-
ation,

Plaintiff,

- VS -

WILLIAM MACON, Individually,
and doing business as
MACON DRUG STORE,

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 FIVE HUNDRED SIXTY-TWO AND 45/100 (\$562.45) Dollars, due from him by account on, to-wit, the 13th day of May, 1958, which sum of money with interest thereon is still unpaid.

Count II.

The Plaintiff claims of the Defendant FIVE HUNDRED SIXTY-TWO AND 45/100 (\$562.45) Dollars, due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 20th day of August, 1958, which sum of money with interest thereon is still unpaid.

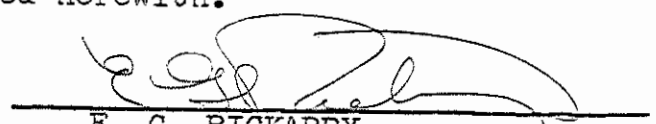
Count III.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED SIXTY-TWO AND 45/100 (\$562.45) Dollars due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 28th day of August, 1957 and the 13th day of May, 1958, which sum of money with interest thereon is still unpaid.


E. G. RICKARBY,
Attorney for Plaintiff.

Note: The account sued on is evidenced by an itemized and verified statement of account filed herewith.

FILED
FEB 1958
ALICE J. DUCK, CLERK
REGISTER
Defendant lives at
Robertsdale, Alabama.


E. G. RICKARBY,
Attorney for Plaintiff.

STATE OF TENNESSEE, } ss.
SHELBY COUNTY

MEMPHIS ASSOCIATION OF CREDIT MEN

On this 20th day of January, 1960
personally appeared before me, the undersigned, G. C. Wilkerson
known to me, who being duly sworn, stated that he is Credit and Collection Manager
of The Upjohn Company Memphis, Tennessee Branch

a corporation organized and doing business under the laws of the State of Delaware

~~of partnership composed of~~

~~and not doing business as~~

and that as such he makes this affidavit; that he is familiar with the books and business of said
The Upjohn Company Memphis, Tennessee Branch

Macon Drug Store

; and that the attached account against
of Robertsdale, Alabama

is within the knowledge of the affiant just and true; that the items thereon stated and composing the said account
were sold and delivered to said Macon Drug Store, Robertsdale, Alabama

at { ~~its~~ } special instance and request; 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

Five Hundred Sixty Two & 45/100-----Dollars

(\$562.45) with interest from-----19-----, is due and unpaid.

(Party making affidavit sign here)

G. C. Wilkerson

Sworn To and subscribed before me. In witness whereof I have set my hand and affixed
my official seal in the City of Memphis, Tenn.



J. A. King

Notary Public

My Commission Expires December 20, 1962

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIAM MACON, Individually, and
doing business as MACON DRUG 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, State of Alabama, at Bay Minette, against WILLIAM MACON,
Individually and doing business as MACON DRUG STORE, Defendant.

by THE UPJOHN COMPANY Memphis, Tennessee Branch, a corporation,
....., Plaintiff.

Witness my hand this 1 day of Feb 1960

Alice J. Luck, Clerk

No. 4161

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

THE UPJOHN COMPANY Memphis,
Tennessee Branch, a corpor-
ation,

Plaintiffs

vs.

WILLIAM MACON, Individually,
and doing business as
MACON DRUG STORE,

Defendants

Summons and Complaint

Filed 2-1 1968

Dee J. Luck Clerk

E. G. RICKARBY,

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

Received In Office

2/1 1968

_____, Sheriff

I have executed this summons

this 2-1 1968

by leaving a copy with

William Maccon
d/b/a
Macon Drug Store

Sheriff claims 50 miles at

Ten Cents per mile Total 5.00

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edleigh Steadman Deputy Sheriff

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

January 29, 1960

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

Dear Mrs. Duck:

Re: Upjohn Company
Vs: Macon Drug Store
Our File: 4637

Enclosed find Summons and Complaint, together
with deposit for costs in the above styled
cause.

Please process and have the sheriff serve
papers on defendant, advising this office when
same has rendered.

Yours very truly,



R/s

Encl.

cc: Nat'l Asso. of Credit Men
cc: Mr. Macon

THE UPJOHN COMPANY,

Memphis Tennessee Branch,
a corporation,

PLAINTIFF

VS

WILLIAM MACON, individually,
and doing business as
MACON DRUG STORE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 4161

Comes now the Defendant in the above styled cause and for answer to
the Plaintiff's Complaint and each and every count thereof separately and
severally says:

1.

Not guilty.

2.

The matters alleged therein are untrue.

Wilters & Brantley

BY: Randy J. Wilters, Jr.

Attorneys for the Defendant

FILED
FEB 10 1960
ALICE J. DUCK, Clerk

201

4161

THE UPJOHN COMPANY Memphis,
Tennessee Branch, a corporation,

Plaintiff

vs

WILLIAM MACON, Individually,
and d/b/a MACON DRUG STORE

Defendant

ANSWER

FILED

FEB 10 1960

ALICE J. DUCK, Clerk

FILED

FEB 10 1960

ALICE J. DUCK, Clerk

STATEMENT

THE UPJOHN COMPANY

FINE PHARMACEUTICALS SINCE 1886

BOX 2525 4805 EAST SUMMER AVENUE

MEMPHIS 2, TENN.

Jan. 20,
1960

MACON DRUG STORE
ROBERTSDALE
ALA.

49

TERMS 60 DAYS NET, OR 2% DISCOUNT IF PAID BY THE
15TH OF THE MONTH FOLLOWING DATE OF PURCHASE.

DATE	CHARGES	CREDITS	BALANCE
			1 7 3.79
3 28	1 6 8.43		
3	2 3 7.89	AUG 29	1 0 6.35 -
6	1 9.05		
7	5 1.20		
22	1 1.77		
23	4 2.75		
3	9 1.78		
3	4.80		
13	1 7.90	MAY 13	2 6 4.58 - NSF check
13	1 0.53	AUG 20	1 2 7.42 -
17	2 7.00	JAN 15	5 0.00 -
26	9.00	MAR 4	2 5.00 -
10	2 7.00	19	5 0.00 -
1	7.20	JUN 12	5 0.00 -
13	4 6.44	AUG 11	5 0.00 -
13	7 4.69		
25	2 6 4.58		5 6 2.45 *

PLEASE RETURN THIS STATEMENT WITH YOUR REMITTANCE