

THE ANDREW JERGENS COMPANY,
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.

4206

C O M P L A I N T

Count I.


The Plaintiff claims of the Defendant ONE HUNDRED TWENTY-SEVEN AND 06/100 (\$127.06) Dollars, due from him by account on, to-wit, the 8th day of December, 1958, which sum of money with interest thereon is still unpaid.

Count II.

The Plaintiff claims of the Defendant ONE HUNDRED TWENTY-SEVEN AND 06/100 (\$127.06) Dollars, due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 12th day of November, 1959, which sum of money, with interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY-SEVEN AND 06/100 (\$127.06) Dollars due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 16th day of June, 1958, and the 8th day of December, 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

MAR 10 60

ALICE J. DUCK, CLERK
REGISTER

Defendant lives at
Robertsdale, Alabama.


E. G. RICKARBY,
Attorney for Plaintiff.

AFFIDAVIT IN PROOF OF CLAIM.

County of Hamilton }
 State of Ohio } SS:

Before me, Allen K Hurlburt a Notary Public duly commissioned and sworn in
 Notary Public

and for the above state and county, this day personally appeared J. E. Slattery
 to me well known, who being by me first duly sworn says that: Name of Officer

*1. He is an individual trading as _____

*2. That he and _____

are partners trading as _____

*3. That he is Credit Manager of The Andrew Jergens Company
 Title of Officer Name of Creditor

of Cincinnati, Ohio a corporation incorporated under the laws of the State of Ohio
 City and State Address

and that the foregoing account in favor of The Andrew Jergens Company
 Creditor

and against Macon Drug Company - Robertsdale, Alabama
 Debtor

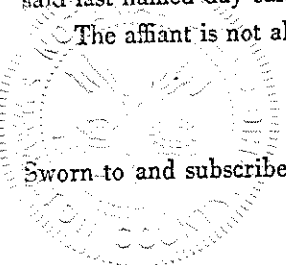
showing a balance and amount due of \$127.06
 Amount

with _____ interest from the _____ day of _____ 19____

until paid, is within his knowledge just, true and correct; that it is justly and truly due and unpaid; that all just and lawful offsets, credits, discounts and payments have been allowed and the said amount is due, after said allowance and exclusive of all set-offs and just grounds of defense; that the goods in said accounts were sold and delivered as therein charged and on said last named day said amount became due and payment thereof was demanded and no part of same has been paid.

The affiant is not able to determine whether or not the debtor is in the military service of the United States.

Sworn to and subscribed before me this 18th day of February 1960
J. E. Slattery Signature of Officer
Allen K Hurlburt Notary Public Signature



ALLEN K. HURLBURT

*Use paragraph covering. Notary Public, Hamilton County, Ohio
 AJ 1296 My Commission Expires Sept. 8, 1962

My commission expires _____

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 ANDREW JERGENS COMPANY, a corporation,

_____, Plaintiff.

Witness my hand this 10 day of March 1960

Reinhold J. Hensch, Clerk

No. 4206 Page

The State of Alabama

Baldwin County

CIRCUIT COURT

THE ANDREW JERGENS COMPANY,

A Corporation,

Plaintiffs

vs.

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

Defendants

Summons and Complaint

FILED

Filed 19

MAR 10 1960

**ALICE J. DUCK, CLERK
REGISTER**

Clerk

E. G. RICKARBY,

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama.

Received In Office

March 10 1960

Sheriff

I have executed this summons

this 3-11 1960

by leaving a copy with

William Maccon

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY *Taylor Wilkins*
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Eddleigh Steadler Deputy Sheriff

Robertsdale, Ala

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

March 9, 1960

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

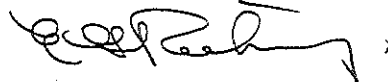
Dear Mrs. Duck:

Re: The Andrews Jergens Company
Vs: William Macon, etc.
Our File: 4830

Enclosed find Summons and Complaint, together
with itemized and verified statement of account,
and court costs in the above styled cause.

Please process, have sheriff serve defendant,
and advise when same has been done. Thanks.

Yours very truly,



ts

cc: (dup) Dun & Bradstreet, Inc.

THE ANDREW JERGENS COMPANY,
A CORPORATION,

PLAINTIFF

VS

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

DEFENDANT

)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA,
) AT LAW
) NO. 4206
)

Comes now the Defendant and for answer to the Plaintiff Complaint
and each count thereof separately and severally says:

1.

The matters alleged therein are untrue.

Wilters & Brantley

FILED
MAR 30 1960
ALICE J. DUCK, Clerk

BY: *Henry J. Wilters*
Attorneys for the Defendant

4206

THE ANDREW JERGENS COMPANY,
A CORPORATION,

PLAINTIFF

VS

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

DEFENDANT

ANSWER

FILED

MAR 30 1960

ALICE J. DUCK, Clerk