

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, d/b/a 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 UNITED STATES RUBBER COMPANY, a New Jersey Corporation.

Witness my hand this the 21st day of April, 1960.

Alice J. Duck  
Clerk

\* \* \* \* \*

COMPLAINT

UNITED STATES RUBBER COMPANY, )  
a New Jersey Corporation, )  
PLAINTIFF )

IN THE CIRCUIT COURT OF

VS: )

BALDWIN COUNTY, ALABAMA

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

AT LAW

COUNT I:

The plaintiff claims of the defendant SIX HUNDRED THIRTY-FIVE & 99/100 DOLLARS (\$635.99) due from him by account on, to wit: the 27th day of June, 1959, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant SIX HUNDRED THIRTY-FIVE & 99/100 DOLLARS (\$635.99), due from him on account stated between the plaintiff and the defendant on, to wit: the 27th day of June, 1959, which sum of money, with interest thereon, is still unpaid.

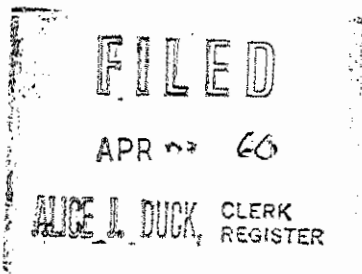
COUNT III:

The plaintiff claims of the defendant SIX HUNDRED THIRTY-FIVE & 99/100 DOLLARS (\$635.99), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 27th day of June, 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 19th day of April, 1960.

The defendant's address is:  
Foley, Alabama

James H. Clum  
Attorney for Plaintiff



77

636  
35  
674

22  
634  
6  
38.04

STATE OF New York  
CITY OF New York  
COUNTY OF New York

SS:

E. W. Oed being duly sworn; says that he is the Assistant Treasurer of UNITED STATES RUBBER COMPANY a corporation organized and existing under the laws of the State of New Jersey; that he is duly authorized to make proof for and on its behalf; that upon information and belief;

W. F. Anderson  
d/b/a Anderson's Department Store

Foley, Alabama

is justly and truly indebted to said UNITED STATES RUBBER COMPANY in the sum of Six Hundred Thirty Five 99/100 DOLLARS (\$635.99 ) with interest at the rate of six percentum (6% per annum from the 27th day of June 1959, for goods sold and delivered to said debtor's special instance and request and on said debtor's promises to pay therefor to said UNITED STATES RUBBER COMPANY that said goods, wares and merchandise were delivered to debtor by the said UNITED STATES RUBBER COMPANY on or about the said date or dates set forth in the annexed statement of account which is hereby made a part hereof, with the same force and effect as if herein set forth at length, and which is a true transcript from the books of account of said UNITED STATES RUBBER COMPANY that the said statement of account is in all respects true, accurate and correct; that there are no offsets or counter-claims to the said indebtedness and liability of said debtor; that said UNITED STATES RUBBER COMPANY has received no manner of security whatsoever for the said indebtedness or any part thereof, nor is the same nor any part thereof, represented by any promissory note or negotiable instrument nor has said UNITED STATES RUBBER COMPANY obtained judgment therefor.

*W. F. Anderson*  
L.S.  
Assistant Treasurer

Sworn to before me this 14<sup>th</sup> 1960  
day of April ~~1959~~

*Mary Howard*  
MARY HOWARD  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 00-000000  
QUALIFIED IN NEW YORK COUNTY  
CERTIFICATE FILED WITH:  
NEW YORK COUNTY CLERK  
NEW YORK COUNTY REGISTER'S OFFICE  
TERM EXPIRES MARCH 29, 1962

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

Served 21 day of April 1960  
on 9 day of May 1960  
served a c. Wm. S. Anderson

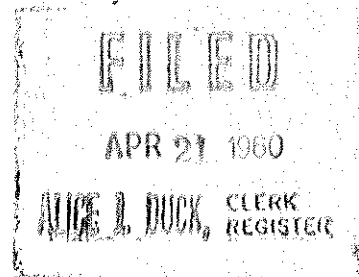
service on  
Wm. S. Anderson  
Sheriff  
Taylor Wilkins

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY Taylor Wilkins  
DEPUTY SHERIFF

UNITED STATES RUBBER COMPANY,  
a New Jersey Corporation,  
PLAINTIFF

VS:

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



LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA