

GRAHAM BEAUTY SUPPLY COMPANY,  
A Corporation,

Plaintiff,

-VS-

IRMA BERNING, Individually,  
and doing business as  
FAIRWAY BEAUTY SALON,

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 FOUR HUNDRED FIVE AND 61/100 (\$405.61) Dollars, due from her by account on, to-wit, the 11th day of August, 1960; which sum of money, with interest thereon, is still unpaid.

Count II.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIVE AND 61/100 (\$405.61) Dollars, due from her for goods and merchandise sold by the Plaintiff to the Defendant between the 8th day of March, 1960, and the 11th day of August, 1960; which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED FIVE AND 61/100 (\$405.61) Dollars, due from her on accounts stated between the Plaintiff and the Defendant on, to-wit, the 11th day of August, 1960; which sum of money with the 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

APR 13 1961

ALICE L. DUCK, CLERK  
REGISTER

  
E. G. RICKARBY, Attorney for  
Plaintiff.

STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

A F F I D A V I T

Personally appeared before me, the undersigned authority in  
and for the aforesaid State and County, MRS. M. R. (JEWELL)  
GRAHAM, the PRESIDENT of the undersigned  
Plaintiff (Corporation - ~~XXXX~~), who being by me first duly sworn,  
according to law, states under oath that the attached account  
against:

(Name) Erma M. Berning, individually, and Erma M. Berning, d/b/a  
Fairway Beauty Shop

(Address) 772 N. W. 1st St.

(City and State) \_\_\_\_\_

for the sum of ----FOUR HUNDRED FIVE AND 61/100 (\$405.61) -----

-----DOLLARS (\$ 405.61 )

is correct as stated and that this sum is due from the aforesaid  
party against whom it is charged and that there are no offsets,  
counter-claims or credits due the said party, except as allowed  
in the attached statement. Further, that to the affiant's know-  
ledge the debtor is not in the military service of the United  
States.

Further, that affiant is the PRESIDENT of

GRAHAM BEAUTY SUPPLY COMPANY

(a corporation organized and doing business under the laws of the  
State of MISSISSIPPI and has been duly authorized by said  
corporation to make this affidavit.)

~~(a partnership composed of \_\_\_\_\_.)~~

~~(a sole trader doing business as \_\_\_\_\_.)~~

GRAHAM BEAUTY SUPPLY COMPANY

By: Mr. Jewell Graham  
PRESIDENT  
(Official Character)

SWORN TO AND SUBSCRIBED before me on this the 20th day of  
March, A. D., 19 61.

MY COMMISSION EXPIRES: May 6, 1963

Gibson Wilkerson  
NOTARY PUBLIC

G R A H A M

BEAUTY SUPPLY CO.

2108 - A ST. Telephone 48 5-5129

Meridian, Mississippi

Sold To: Fairway Beauty Shop (Erma M. Berning)

Address: 772 Merwina Street

City: Mobile State: Alabama

STATEMENT:

	Amount:
Invoice B 8313 -----	\$154.50
Invoice B 6342-----	318.79
	<u>\$473.29</u>
7-16-60 Less Payment-----	- 40.00
10-13-60 Less Payment-----	- 27.68
Balance Due:	<u>\$405.61</u>

# GRAHAM BEAUTY SUPPLY CO.

2108 - A ST.

Telephone 48 5-5129  
Meridian, Mississippi

INVOICE

N<sup>o</sup> ~~40002~~  
B-8313

Date June 30 1960

Sold To

Fairway Beauty Shop (Erma M. Berning)

Address

772 Merwina Street

Mobile Alabama

Salesman H. Nobinger

City

State

QUAN.

DESCRIPTION

AMOUNT

1

Tan Harting All Purpose chair

150.00

CASH

C.O.D.

CHARGE

RETD. MDSE.

MDSE. TOTAL

150.00

EXPRESS

PARCEL POST

COLLECT

PREPAID

FED. EX. TAX

ST. SALES TAX

4.50

DELY. CHRQ.

DELY. INS.

TOTAL

154.50

Erma M. Berning

RECEIVED BY

NOTICE: CLAIMS MUST BE MADE WITHIN 8 DAYS AFTER RECEIPT OF GOODS AND ACCOMPANIED BY

**Meridian, Mississippi**

B 6342

Date Aug. 11, 196 0

Sold To Fairway Beauty Shop (Erma M. Berning)

Address 772 Merwina Street

City Mobile State Alabama Salesman H. Nobinger

CASH	C.O.D.	CHARGE	RETD. MDSE.	MDSE. TOTAL			309.50
EXPRESS	PARCEL POST	COLLECT	PREPAID	FED. EX. TAX			
				ST. SALES TAX			92 9
				DELY. CHRQ.			
				DELY. INS.			
				TOTAL			318.79

Erma M. Berning

RECEIVED BY \_\_\_\_\_

**NOTICE: CLAIMS MUST BE MADE WITHIN 3 DAYS AFTER RECEIPT OF GOODS AND ACCOMPANIED BY THIS INVOICE.**

SUMMONS AND COMPLAINT

Moore Printing 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 IRMA BERNING

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 IRMA BERNING.

individually, and d/b/e FAIRWAY BEAUTY SALON, Defendant

by GRAHAM BEAUTY SUPPLY COMPANY, a corporation,

\_\_\_\_\_, Plaintiff

Witness my hand this 3 day of Apr 1961.

Reice J. Newk, Clerk

No. 4665

Page \_\_\_\_\_

**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

GRAHAM BEAUTY SUPPLY COMPANY,

A Corporation,

Plaintiffs

vs.

IRMA BERNING, Individually

a/d/b/e FAIRWAY BEAUTY SALON

Defendants

**SUMMONS and COMPLAINT**

**FILED**

Filed \_\_\_\_\_

19 \_\_\_\_\_

**APR 3 1961**

**ALICE L. DUCK**

**CLERK  
REGISTER**

Clerk

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama (P.O. Box 542)

RECEIVED IN OFFICE

4/3, 1961

\_\_\_\_\_, Sheriff

I have executed this summons

this 4 April, 1961  
by leaving a copy with

Irma Berning

Sheriff claims 20 miles at

200

Ten Cents per mile Total \$

2.00

TAYLOR WILKINS, Sheriff

BY

W. O. Garner

DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. O. Garner Deputy Sheriff

Daphne

**E. G. RICKARBY**

392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

March 28, 1961

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

Dear Mrs. Duck:

Inre: Graham Beauty Supply Company  
Vs: Fairway Beauty Salon  
Our File: 5402

With this we are handing you Summons and Complaint,  
together with itemized and verified statement of  
account, along with check for costs in the above  
mentioned cause.

Please process and have the sheriff serve papers on  
Mrs. Berning, who is living in Daphne, Alabama.

Yours very truly,



ts

encl.

cc: (dup) Messrs. Witherspoon & Compton