

4665

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 J. 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 1/2

(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 knowledge 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: *Mrs Jewell Graham*
PRESIDENT
(Official Character)

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

Gibson Wilkerson
NOTARY PUBLIC

MY COMMISSION EXPIRES: May 6, 1963

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
	<hr/>
	\$473.29
7-16-60 Less Payment-----	- 40.00
10-13-60 Less Payment-----	- 27.68
	<hr/>
Balance Due:	\$405.61

GRAHAM BEAUTY SUPPLY CO.

2108 - A ST.

Telephone 48 5-5129

Meridian, Mississippi

INVOICE

No. ~~40002~~
B-8313

Date June 30 1960

Sold To

Fairway Beauty Shop (Erma M. Berning)

Address

772 Merwina Street

Mobile Alabama

City

State

Salesman H. Nobinger

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. CHR.G.

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 RECEIPT

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.

Rebecca J. Newk, Clerk

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 _____, 19 _____

FILED

APR 3 1961

ALICE J. 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 70 miles at

Ten Cents per mile Total \$ 7.00

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