

THE NATIONAL ROSE COMPANY,  
Plaintiff,

-VS-

H. C. FOSBERG, Individually,  
and doing business as  
FOSBERG FURNITURE COMPANY,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

C O M P L A I N T

Seunt I


The Plaintiff claims of the Defendant FOUR HUNDRED FIFTY-NINE AND 52/100 (\$459.52) DOLLARS due from him by account on, to-wit, the 13th day of December, 1961; which sum of money with interest thereon is unpaid.

Count II


The Plaintiff claims of the Defendant FOUR HUNDRED FIFTY-NINE AND 52/100 (\$459.52) DOLLARS due from him for merchandise, goods and chattel sold by the Plaintiff to the Defendant between the 9th day of March, 1960, and the 24th day of March, 1961; which sums of money, with the interest thereon, are still unpaid.

Count III

The Plaintiff claims of the Defendant FOUR HUNDRED FIFTY-NINE AND 52/100 (\$459.52) DOLLARS due from him on accounts stated between the Plaintiff and the Defendant on, to-wit, the 13th day of December, 1961; 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.

  
E. G. RICKARBY,  
Attorney for Plaintiff.

FILED

APR 17 1962

ALICE J. DUCK, CLERK  
REGISTER

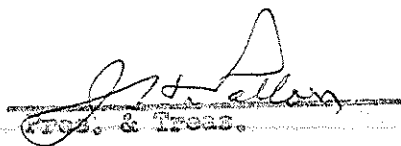
STATE OF TENNESSEE

S. S.

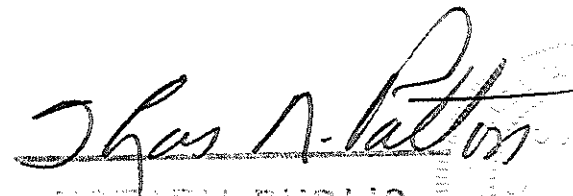
COUNTY OF SHELBY

Be it remembered, that on this 6th day of April 19 62  
before me, the undersigned Notary Public, in and for said county and state,  
duly commissioned and qualified, personally appeared J. H. Patton,  
who being duly sworn, deposeth and saith that he is President and Treasurer  
of the National Rose Company, Memphis, Tennessee and that the annexed account  
exhibiting the sum of Four Hundred Fifty Nine & 52/100(459.52) Dollars  
Against Fosberg Furniture Company, Robertsdale, Alabama  
is just and true as stated: that The National Rose Company  
have not received any part of the money stated to be due, or any security  
or satisfaction for the same, and that all just credits have been given.

THE NATIONAL ROSE COMPANY

  
Pres. & Treas.

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

  
NOTARY PUBLIC  
My Commission Expires March 24, 1965



The following is an itemized and verified statement of the account of:  
 Fosberg Furniture Company  
 Robertsdale, Alabama

Invoice No. 38456 dated December 9, 1960

2	#10 Narco Frames	5.45	10.90	
1	DDS Baby Bed, Natural W/Little Kub Crib Matt.		21.95	
1	11-385 Baby Bed, Natural W/Little Kub Crib Matt.		23.95	
1	4/6 Serta Betty Crockett Quilt Matt., 1669		<u>21.45</u>	
				78.25

Invoice No. 111831 dated December 12, 1960

1	No. 1401 Double Dresser & Mirror		62.95	
1	No. 1433 4/6 Bar Bed		37.25	
1	No. 1405 Chest		34.95	
1	No. 361-12-34-64 3 Pc. Suite		149.95	
	(Double Dresser, Chest & Poster Bed)		<u>285.10</u>	
	Less freight allowance 730 lbs. @1.25 CWT		<u>9.13</u>	
				275.97

Invoice No. 41187 dated January 30, 1961

1	No. 158 (161) Rocker, Brown		29.95	
	Plus 5% Trailer Freight		<u>1.50</u>	
				31.45

Invoice No. 42719 dated February 7, 1961

1	No. 158 Rocker, Beige		29.95	
2	No. 202 4/6 Metal Beds	11.25	22.50	
2	No. 202 3/3 Metal Beds	11.25	<u>22.50</u>	
			74.95	
	Plus 5% Trailer Freight		<u>3.75</u>	
				78.70

Invoice No. 44005 Dated February 10, 1961

1	4/6 Betty Crockett Mattress & Box Spring Comb. 1669		41.95	
1	3/3 Delta Mattress		8.35	
1	4/6 Delta Mattress		8.95	
2	4/6 Silvermoon Springs	16.85	<u>33.70</u>	
				92.95

Invoice No. 48486 dated March 24, 1961

2	4/6 Silvermoon Springs	16.85	33.70	
2	4/6 #650 Springs	11.50	23.00	
1	11-385 Baby Crib, Natural W/Little Kub Crib Matt.		<u>23.95</u>	
				80.65

Less credit: Collection on December 13, 1961

	<u>637.97</u>
	<u>188.40</u>
\$	449.57

SUMMONS AND COMPLAINT

Baldwin Times

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 H. C. FOSBERG, individually and doing  
business as FOSBERG FURNITURE COMPANY,

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 H. C. FOSBERG,  
individually and d/b/a FOSBERG FURNITURE COMPANY, Defendant  
by THE NATIONAL ROSE COMPANY,

Witness my hand this 17 day of April 19 62 Plaintiff

Walter J. Clark Clerk

No. 5115

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

THE NATIONAL ROSE COMPANY,

Plaintiffs

vs.

H. C. FOSBERG, Ind. and d/b/a

FOSBERG FURNITURE COMPANY.

Defendants

**SUMMONS and COMPLAINT**

Filed

**FILED**

, 19

APR 17 1962

Clerk

ALICE J. DUCK, CLERK  
REGISTER

E. G. RICKARBY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

RECEIVED IN OFFICE

4-17, 1962

, Sheriff

I have executed this summons

this

April 18, 1962

by leaving a copy with

H. C. Fosberg

Sheriff claims

50

miles at

Ten Cents per mile Total \$

5.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff  
Robert E. Rickarby Deputy Sheriff

R. Rickarby

**E. G. RICKARBY**

392 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA

May 15, 1962

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

Dear Mrs. Duck:

Please dismiss the case of The National Rose Company vs.  
H. C. Fosbert, Ind. & d/b/a Fosberg Furniture Company,  
Case #5115, as it has been paid.

If there are any unused costs, please return same and  
oblige.

Yours very truly,



EGR/ts  
cc: National Rose Company