LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, (1)
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN
IRWIN W. COLEMAN JR.

January 11, 1962



Honorable Alice J. Duck Clerk, Circuit Court of Baldwin County Bay Minette, Alabama

Re: United States Fidelity and Guaranty Company v. Frederick's Dredging Co., Inc.

Dear Mrs. Duck:

We enclose herewith a copy of a Complaint which we ask be filed in the Circuit Court of Baldwin County, Alabama. It would be appreciated if you would acknowledge receipt of this complaint by an annotation on the extra copy of this letter.

With best wishes for a Happy and Prosperous New Year, we are

Very truly yours,

LYONS, PIPES AND COOK

Gordon B. Kahn

GBK:mb
Encl.

cc: Mr. J. L. Weed

United States Fidelity and Guaranty Company

400 Milner Building Mobile, Alabama

LYONS, PIPES & COOK

ATTORNEYS AT LAW

SIZ FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH M. LYONS (1900-1957)
SAM W. PIPES, 111
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN
IRWIN W. COLCHAN, JR.
C. SAGE LYONS

October 30, 1962

Honorable Alice J. Duck Clerk of the Circuit Court of Baldwin County, Alabama Bay Minette, Alabama

Re: United States Fidelity and Guaranty Company vs. Frederick's Dredging Company, Inc. - Case No. 4986, In the Circuit Court of Baldwin County, Alabama.

Dear Mrs. Duck:

As attorneys for the plaintiff in the above-mentioned cause, we respectfully request that a non-suit be entered. It would be appreciated if you would send us the bill for costs at your convenience.

Very truly yours,

LYONS, PIPES & COOK

Gordon B. Kahn

GBK:mb

LYONS, PIPES AND COOK ATTORNEYS-AT-LAW

516-519 FIRST NATIONAL BANK BUILDING

HE 2-4484 P. O. BOX 265 MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES, III
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN
IRWIN W. COLEMAN, JR.

G. SAGE LYONS

October 30, 1962

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Re

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Dear Mrs. Duck:

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P

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LXONS, PIPES & COOK

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Cordon B. Kahn

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THE	STATE	OF	ALABA	AMA,
2127.9				

BALDWIN COUNTY

No.	4986	uudd paramier	-
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CIRCUIT COURT, BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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to appea	ar and plead, ans	wer or demur,	within thirty days	from the service hereof, to	the complai	int filed i	n the
	Court of Baldwir	County, State	of Alabama, at B	ay Minette, against			-
1 (2) 1 (2)	Fredrick D	redging Com	oany, Inc. A C	orp	, I	Defendant	
by	United Sta	ted Fidelit	7 And Gueranty	Co. A Corp.			
1 100 1 100			· .			Plaintiff	

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UNITED STATES FIDELITY AND Q IN THE CIRCUIT COURT OF GUARANTY COMPANY, A Corporation, RALDWIN COUNTY, ALABAMA Ĭ. Plaintiff. AT LAW -VS-Ų. CASE NO. 4984 FREDERICK'S DREDGING CO., INC., A Corporation, Ĭ X Defendant.

COUNT ONE

The Plaintiff claims of the Defendant One Thousand

Two Hundred Three and 79/100 (\$1,203.79) Dollars, the balance due

from it by account on to-wit the 20th day of April, 1960, which sum

of money with the interest thereon is still unpaid.

COUNT TWO

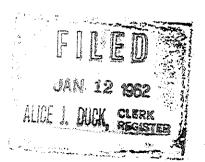
The Plaintiff claims of the Defendant One Thousand Two Hundred Three and 79/100 (\$1,203.79) Dollars, due from it on an account stated betweenthe Plaintiff and the Defendant on to-wit the 21st day of April, 1961, which sum of money with the interest thereon is still unpaid.

Your Jisal Cook
Attorneys for the Plaintiff

Defendant may be served at:
Foley, Alabama

An itemized verified statement of account sued on in Count One is attached hereto and made a part hereof by reference.

Gordon B. Kahn



UNITED STATES FIDELITY AND GUARANTY COMPANY



BIRMINGHAM OFFICE

FIRST NATIONAL BUILDING, BIRMINGHAM 3, ALA.

U.S.F.&G.

Dec. 13, 1961

Fredericks Dredging Company,

Foley, Alabama

·					
NUMBER	DATE	INSURED	CHARGE	CREDIT	NET
J-317320	4 20 60	Workmen's Compensation Additional Premium 4 20 60 to 4 20 61	4,576.75		
J - 506737		Workmen's Compensation Return Premium 4 20 59 to 4 20 60		731.70	
		Payment April 21, 1961		2641.26	
		·	4,576.75	3,372.96	
		Balance due Comp	any		\$1,203.79
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0011000		van Dowell			
Birmingham 165		V. A. McDowell, Jr., Sup Accounting Department	5.		

UNITED STATES FIDELITY AND GUARANTY COMPANY, A Corpora-	X	IN THE CIRCUIT COURT OF
tion,	¥	BALDWIN COUNTY, ALABAMA
Plaintiff,	Ž	AT LAW
-VS-	X	RT TRAM
FREDERICK'S DREDGING CO., INC., A Corporation,	X	CASE NO. 14 984
Defendant.	X	

COUNT ONE

The Plaintiff claims of the Defendant One Thousand

Two Hundred Three and 79/100 (\$1,203.79) Dollars, the balance due

from it by account on to-wit the 20th day of April, 1960, which sum

of money with the interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant One Thousand Two Hundred Three and 79/100 (\$1,203.79) Dollars, due from it on an account stated betweenthe Plaintiff and the Defendant on to-wit the 21st day of April, 1961, which sum of money with the interest thereon is still unpaid.

LYONS, PIPES AND COOK Attorneys for the Plaintiff

Defendant may be served at: Foley, Alabama

An itemized verified statement of account sued on in Count One is attached hereto and made a part hereof by reference.

Cordon B. Kahn

UNITED STATES FIDELITY AND GUARANTY COMPANY



BIRMINGHAM OFFICE

FIRST NATIONAL BUILDING, BIRMINGHAM 3, ALA.

U.S.F.&G.

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		Payment April 21, 1961		2641.26	
			4,576.75	3,372.96	<u> </u>
		Balance due Comp	any		\$1,203.79
I hereby correct.	certify t	hat the above statement is	true and		
0011000.		1000 Lowell			
Birmingham 165		V. A. McDowell, Jr., Sur Accounting Department	<i>y</i> •		

THE STATE OF ALABAMA,

BALDWIN COUNTY

		CIRCUIT	COURT,	BALDWIN	I COUNT	Ϋ́
No.	4986					
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TO ANY SHERIFF OF THE STATE OF ALABAMA:

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to appea	ar and plead	l, answe	r or demur,	within thirty days from	the service here	of, to the com	plaint filed i	n the
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1 2 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Fredric	k Dred	ging Comp	any, Inc. A Corp		<u></u>	., Defendant	
by	United :	States	Fidelity	And Guaranty Co.	. A Corp.			
No.		:						
					<u></u>	<u> </u>	, Plaintiff	
Witness	my hand t	this	<u> 12th</u>	day of	January		19 62	
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