

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

FRANK T. POPE, JR.

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

January 11, 1962

4986

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

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G. 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

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October 30, 1962

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Clerk of the Circuit Court
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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

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SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4986

TERM, 1962

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Fredrick Dredging Company, Inc. A Corp

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

Fredrick Dredging Company, Inc. A Corp

, Defendant.....

by United States Fidelity And Guaranty Co. A Corp.

, Plaintiff.....

Witness my hand this 12th day of January 1962

Alice J. Quick, Clerk

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

vs.

Plaintiffs

Defendants

SUMMONS and COMPLAINT

Filed _____, 19____

_____, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

_____, 19____

_____, Sheriff

I have executed this summons

this _____, 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

UNITED STATES FIDELITY AND
GUARANTY COMPANY, A Corpora-
tion,

Plaintiff,

-vs-

FREDERICK'S DREDGING CO., INC.,
A Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4986

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 between the Plaintiff and the Defendant on to-wit
the 21st day of April, 1961, which sum of money with the interest
thereon is still unpaid.

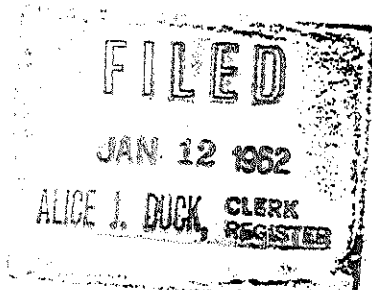
Lyons, Pipes and Cook
LYONS, PIPES AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

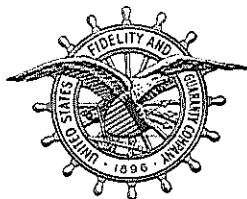
Foley, Alabama

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

Gordon B. Kahn
Gordon B. Kahn



UNITED STATES FIDELITY AND GUARANTY COMPANY



U.S.F.&G.


BIRMINGHAM OFFICE

FIRST NATIONAL BUILDING, BIRMINGHAM 3, ALA.

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	4 20 59	Workmen's Compensation Return Premium 4 20 59 to 4 20 60		731.70	
		Payment April 21, 1961		2641.26	
		Balance due Company	4,576.75	3,372.96	\$1,203.79
I hereby correct.	certify that the above statement is true and	 V. A. McDowell, Jr., Supt. Accounting Department			

UNITED STATES FIDELITY AND
GUARANTY COMPANY, A Corpora-
tion,

Plaintiff,

-vs-

FREDERICK'S DREDGING CO., INC.,
A Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

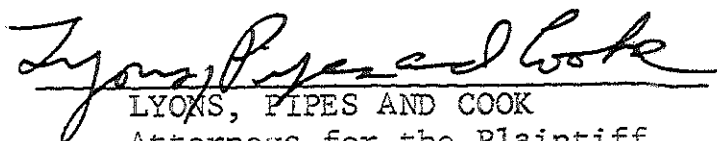
CASE NO. 14986

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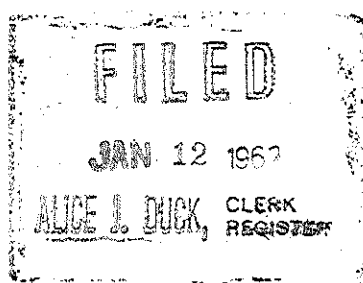

LYONS, PIPES AND COOK
Attorneys for the Plaintiff

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.

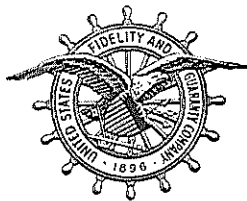

Gordon B. Kahn



UNITED STATES FIDELITY AND GUARANTY COMPANY

BIRMINGHAM OFFICE

FIRST NATIONAL BUILDING, BIRMINGHAM 3, ALA.

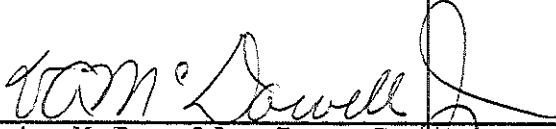


U.S.F.&G.

Dec. 13, 1961

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		Balance due Company	4,576.75	3,372.96	\$1,203.79
I hereby certify that the above statement is true and correct.					
		 V. A. McDowell, Jr., Supt. Accounting Department			

SUMMONS AND COMPLAINT

Baldwin Times

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BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4986

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Fredrick Dredging Company, Inc. A Corp

Defendant

by United States Fidelity And Guaranty Co. A Corp.

Plaintiff

Witness my hand this 12th day of January 19 62

Clerk

No. 1986

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

UNITED STATES FIDELITY AND

GUARANTY CO. A CORP

Plaintiffs

vs.

FREDRICK'S DREDGING CO. INC. A CORP

Not Found

Defendants

SUMMONS and COMPLAINT

Filed 1-12-, 19 62

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

1/12, 1962

Sheriff

I have executed this summons

this, 19

by leaving a copy with

*Frederick's
Dredging Co. by
service on*

*Returned
not found in my county after diligent search and
quint.*

BY

Deputy Sheriff

Sheriff

Deputy Sheriff