

HAMILTON, DENNISTON, BUTLER & RIDDICK

ATTORNEYS & COUNSELLORS AT LAW

AMERICAN NATIONAL BANK BUILDING

P. O. BOX 1671

MOBILE, ALABAMA

February 15, 1962

THOMAS A. HAMILTON
ROBERT P. DENNISTON
CHARLES R. BUTLER
HARRY H. RIDDICK

MILLER A. WIDEMIRE
OLIVER J. LATOUR, JR.
J. GORDON HOUSE, JR.
FERRILL D. McRAE

PETER HAMILTON (1836-1886)
THOMAS A. HAMILTON (1844-1897)
J. GAILLARD HAMILTON (1899-1956)

Mrs. Alice J. Duck, Clerk
Circuit Court
County Court House
Baldwin County
Bay Minette, Alabama

Re: Foster-Marsch Corporation, Plaintiff
vs. Wallace G. Frederick
At Law No. 5019
Our File No. 15,414 - MAW

Dear Mrs. Duck:

We understand that the Sheriff has made return not found in the above case.

At the direction of our client, we have been requested to enter a voluntary non-suit on motion of the Plaintiff in the above case against Mr. Frederick individually.

This will in no way effect Case No. 5018 against Frederick Dredging Company, Inc., the corporation.

We would appreciate your having this voluntary non-suit entered.

Yours very truly,


For the Firm

MAW/lgm
No. 15,414

cc: Mr. Richard G. Lacey, Attorney
Mr. L. C. LeBron
222 Woodlawn Drive
Panama City, Florida

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5019

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Wallace G. Frederick

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

Wallace G. Frederick, Defendant.

by Foster- Marsch Corporation

Plaintiff.

Witness my hand this 6th day of February 1962

Clerk

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

FOSTER-MARSCH CORPORATION,

Plaintiff

vs.

WALLACE G. FREDERICK,

Defendant

I

IN THE CIRCUIT COURT

I

OF BALDWIN COUNTY,

I

ALABAMA

I

AT LAW

I

NO. _____

COUNT ONE

The Plaintiff claims of the Defendant SIX THOUSAND FIFTY DOLLARS (\$6,050) due by promissory note made by him on the 6th day of September, 1961, and payable on, to-wit, the 21st day of November, 1961, with interest thereon from and after, to-wit, November 21, 1961. The Plaintiff further alleges that in said note and as a part of the consideration thereof, the Defendant agreed to pay attorney's fees for the collection thereof, and that a reasonable attorney's fee for the collection thereof is \$1250.00, which further sum the Plaintiff claims of the Defendant.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By

Miller A. Widener

Member appearing

Attorneys for the Plaintiff

The Defendant may be served at:

Frederick Dredging Company
Foley, Alabama

FILED
FEB 6 1962
ALICE J. DUCK, CLERK
REGISTER

FOSTER-MARSCH CORPORATION, | IN THE CIRCUIT COURT
 | OF BALDWIN COUNTY,
Plaintiff | ALABAMA
vs. | AT LAW
WALLACE G. FREDERICK, | NO. 5019
 |
Defendant

COUNT ONE

The Plaintiff claims of the Defendant SIX THOUSAND FIFTY DOLLARS (\$6,050) due by promissory note made by him on the 6th day of September, 1961, and payable on, to-wit, the 21st day of November, 1961, with interest thereon from and after, to-wit, November 21, 1961. The Plaintiff further alleges that in said note and as a part of the consideration thereof, the Defendant agreed to pay attorney's fees for the collection thereof, and that a reasonable attorney's fee for the collection thereof is \$1250.00, which further sum the Plaintiff claims of the Defendant.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By *R. Miller A. Wedemire*
Member appearing
Attorneys for the Plaintiff

The Defendant may be served at:

Frederick Dredging Company
Foley, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5019

TERM, 19

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to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the

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Wallace G. Frederick, Defendant

by Foster- Marsch Corporation

Plaintiff

Witness my hand this 6th day of February 1962

N.F.

Alice J. Mack, Clerk

No. 5019

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

FOSTER MARSCH CORPORATION

vs.

Plaintiffs

WALLACE G. FREDERICK

Defendants

SUMMONS and COMPLAINT

Filed February 6, 19 62

Alice J. Duck, Clerk

Hamilton, Denniston, Butler & Riddick
P.O. Box 1671
Mobile, Alabama

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

2/6, 19 62

Sheriff

I have executed this summons

this, 19

by leaving a copy with

7
FEB 10 1962
CLERK

Verbal
CLERK

Sheriff

Deputy Sheriff