

# JAMES A. BRICE ATTORNEY AT LAW

BOX 298 • FOLEY, ALABAMA • WH 3-3601

	MESSAEE		LY
TO	Mrs. Alice J. Duck Circuit Clerk Bay Minette, Alabama	DATE	
DATE	August 13, 1963		
generage die Prince	Enclosure: Summons and Complaint		
	Re: Drs. Warren, Hays & Yaeger Vs: Northcutt		
	Re: State Bank of Elberta Vs: M. D. Dawkins		
	Re: Intermational Minerals & Chem Vs: Dana Dugger  W/ 25 Check	ical Corp.	
SY.	INSTRUCTIONS A SENOCE:	SIGNED INSTRUCTIONS TO	SECTIVER:

I. WRITE REPLY. D. DETACH STUB. REEP PINK CORY, RETURN WHITE CORY TO SENDER.

#### JAMES A. BRICE

ATTORNEY AT LAW Foley, Alabama

P.O. Box 298

WHITEHALL 3-3601

October 15, 1963

Mrs. Alice J. Duck Circuit Clerk Bay Minette, Alabama

Re: International Minerals & Chemical

Corporation

Vs: Dana Dugger

Non-jury, No. 5673

Dear Mrs. Duck:

Judgment for plaintiff by default was rendered on October 14, 1963, for \$1,010.39. In order to complete the file, a sworn statement of account, together with the promissory note are herewith enclosed.

It will of course be appreciated if you will send me a certificate of judgment, as usual, together with the cost bill reflecting deposit for costs.

ames A. Brice

JAB: j

cc: Mr. S. R. Smith

Area Credit Manager

International Minerals & Chemical

Corporation

1489 Willingham Drive East Point, Georgia

### INTERNATIONAL MINERALS & CHEMICAL CORPORATION

1489 WILLINGHAM DRIVE

EAST POINT, GEORGIA

#### STATEMENT OF ACCOUNT

NAME

Dana Dugger

**ADDRESS** 

Foley, Ala.

DATE 59/60

CITY AND STATE

TERMS:

PER INVOICE

FORM 4-237 10M 4-63

PRINTED IN U.S. OF AMERICA

CITT AND STATE					I ERWO	PER INV			
all accounts are due and payable as per invoice SALESMAN Lufkin									
DATE REFERENCE		T O N S		CHARGES	CREDITS		BALANCE		
			MIXED SUPER- FERTILIZER PHOSPHATE M		MATERIALS	MATERIALS			
							BALANCE FORWARD		
July 17,	1959 PE	53 Net	4.00			134.00			134.00
July 20,	1959 PE	59 Net	4.00			112.00	The state of the s		246.00
Oct. 27,	1959 PE '	76 Net	1.00	,		28.00			274.00
			A CONTRACTOR OF THE CONTRACTOR						
							marter + 4-4444+ (HW) principal		
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			1			y that the above t of balance owe		le and	correct
					I	NTERNATIONAL MI	VERALS &	HEMICA	L CORPORATION
						BY Area Credit I	Vanager	nll	<u></u>
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1						Jublic, Baldy	in Count	Ev. A	abama (
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		···							

INTERNATIONAL MINERALS & CHEMICAL CORPORATION, a corporation

PLAINTIFF

IN THE CIRCUIT COURT OF

VS

BALDWIN COUNTY, ALABAMA

DANA DUGGER,

AT LAW

DEFENDANT

5673

COMPLAINT

Charles and the

T

The Plaintiff claims of the Defendant Two Hundred Seventyfour (\$274.00) Dollars, due from him on account, to-wit: the
27th day of October 1959, which sum of money, with interest thereon,
is still unpaid.

The Plaintiff claims of the Defendant Two Hundred Seventyfour (\$274.00) Dollars, due from him for merchandise, goods and
chattels sold by the Plaintiff to the Defendant, on to-wit: the
27th day of October 1959, which sum of money, with interest thereon,
is still unpaid.

II

The Plaintiff claims of the Defendant Four Hundred Sixty-two and 30/100 (\$462.30) Dollars, due by promissory note made by the Defendant on the 1st day of January 1960, and payable on November 30, 1962, with interest from January 1, 1960 at the rate of six (6%) per cent per annum.

Plaintiff avers that in and by the terms of said note the

Defendant waived all right to exemption under the constitution

and laws of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the Defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendant the further and additional sum of Ninety (\$90.00) Dollars as such reasonable attorney's fee.

FILED

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ALUE I DUCK, CLERK REGISTER

Solicitor for Plaintiff

The State of Alabama,	Circuit Court, Baldw	in County
Baldwin County.	)	TERM, 19
TO ANY SHERIFF OF THE	STATE OF ALABAMA	
You Are Commanded to Summon	Dana Dugger	
**************************************		
	nur, within thirty days from the service hereo	<i>'</i>
	Dana Dugger	, Defendant
byInternational Min	erals & Chemical Corporation,	_a_corporation
		_
Witness my hand this	2 day of August 1	
61-9-10-63	Miee X. M.	Clerk

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# STATE of ALABAMA

**Baldwin County** 

## CIRCUIT COURT

International Minerals & Chem-

icals Corporation, a corporation

Plaintiffs

VS.

Dana Dugger

Defendants

Summons and Complaint

AUG 45 1963

\_ Clerk

ALME I DUCK CLERK REGISTER

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

Oug 15, 1963

Sheriff.

I have executed this summons

this 10 Th Day of Sautember 1965 by leaving a copy with

Ma Daira Dugas (wife

Sheriff claims 7) miles at 1 on Cents per mile Total \$ 7 0 on Straight Total \$

DEPUTY SHERIFF

Taylor Wellsus

Sheriff.

Deputy Sheriff.

Toly