

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

June 5, 1963

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

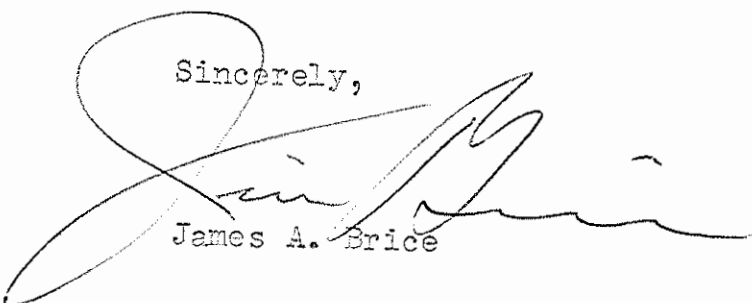
Re: F. Dougherty & Associates, Inc.
Vs: J. R. Wood, Sr., etc.
At Law, No. 5471

Dear Mrs. Duck:

Kindly ask Judge Hall to enter judgment for plaintiff
by default for \$138.85 plus costs.

Please send certificate of judgment. Thank you.

Sincerely,



James A. Brice

cc: Dun and Bradstreet
Columbia, S. C.

COMPLAINT

F DOUGHERTY AND ASSOCIATES, INC.,)
a corporation

PLAINTIFF

VS

J. R. WOOD, SR. ALSO D/B/A/
WOODCRAFT or DAPHNE BOAT CENTER
DEFENDANT

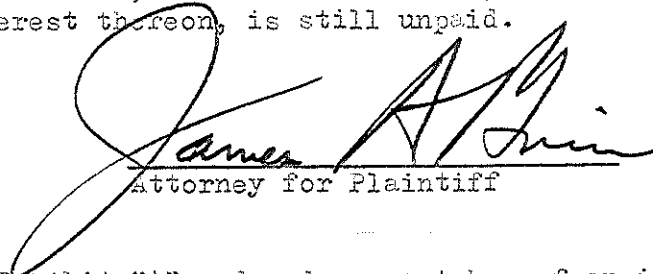
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I

The plaintiff claims of the defendant the sum of One hundred thirty eight and 85/100(\$138.85)Dollars, due from him on account, to-wit: May 7, 1962, which sum of money, with interest thereon, is still unpaid.

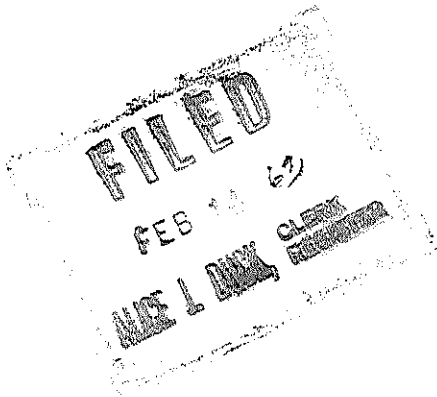
II

The plaintiff claims of the defendant One hundred thirtyeight and 85/100 (\$138.85)Dollars, due from him for merchandise, goods, and chattels sold by the plaintiff to the defendant on, to-wit: the 7th day of May, 1962, which sum of money, with interest thereon, is still unpaid.


Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Francis S. Dougherty, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 7th day of May, 1962, and due at present.

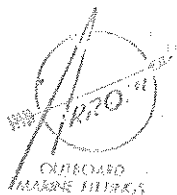
The defendant lives in Daphne, Alabama.



STATEMENT

DOUGHERTY MARINE PRODUCTS
DIVISION OF F. DOUGHERTY AND ASSOCIATES, INC.

P. O. BOX 794, CHARLESTON, S. C.



Mr. J. R. Wood Sr. D B A

Woodcraft Mfg. Co.

&

Daphne Boat Center

NAME

ADDRESS

CITY Daphne, Alabama

CR

R

DATE	INVOICE NUMBER	CHARGES	CREDITS	BALANCE
BALANCE FORWARD				
7-24-61	3905	40.39		40.39
9-8-61	4243	73.10		113.49
11-10-61	5269	90.54		204.03
12-19-61	182	47.67		251.70
1-15-62	Check		90.54	161.16
2-2-62	Check		57.67	103.49
2-9-62	641	45.36		148.85
3-26-62	1293	95.17		244.02
5-7-62	Check		108.17	138.85

TERMS: 1% BILLS DATED 1-15, PAYABLE 25TH
1% BILLS DATED 16-31, PAYABLE 10TH PROX.
30 DAYS NET

PAY LAST BALANCE

COUNTY OF Charleston

SG-188 (13743)

STATE OF South Carolina

Be it remembered, that on this 26th day of January,
A. D., 1963, personally appeared before me, the undersigned authority,
Francis S. Dougherty

who being duly sworn, upon his oath stated that he is President known to me
of F. S. Dougherty & Associates, Inc.

{ a corporation organized and doing business under the laws of the State of South Carolina
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____

_____ a sole trader doing business as _____
and that as such he makes this affidavit; that he is familiar with the books and business of
said corporation _____; that the attached account against
F. J. R. Wood Sr. LBA Wood Craft of Daphne, Ala

or Daphne Boat Center is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Mr. Wood

at { its } special instance and request, that credit has been duly given for all payments and
{ their }
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of one hundred thirty eight and 85/100 Dollars
(\$ 138.85) with interest from March 26, 1962 is justly due and
remains unpaid.

Francis S. Dougherty X

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of South Carolina
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

Julia B. Dougherty
Notary Public

County of Charleston State of South Carolina
My commission expires at the pleasure of the governor A. D. 1963

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon J. R. Wood, Sr., also d/b/a Woodcraft or Daphne

Boat Center

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 J. R. Wood, Sr., also
d/b/a Woodcraft or Daphne Boat Center, Defendant...

by F. Dougherty and Associates, Inc., a corporation

-----, Plaintiff...

Witness my hand this

14 day of

Feb 1963

Alice D. Duck, Clerk

No. 5471 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

F. Dougherty and Associates,
Inc., a corporation

Plaintiffs

vs.

J. R. Wood, Sr., also d/b/a
Woodcraft or Daphne Boat Center

Marlow
Defendants

Summons and Complaint

Filed _____

FILED

19 _____

FEB 14-63

Clerk

**MADE L. DICK, CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

Feb 14 1963

_____, Sheriff

I have executed this summons
this 26th day of Feb 1963
by leaving a copy with

J. R. Wood, Sr.

Sheriff claims 80 miles at
Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Leibert Deputy Sheriff

Marlow

F. DOUGHERTY & ASSOCIATES, INC.,
A Corporation,

Plaintiff,

VS.

J. R. WOOD, SR. also D/B/A
WOODCRAFT or DAPHNE BOAT CENTER,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

5471

PLEAS and AFFIDAVIT

Plea ONE

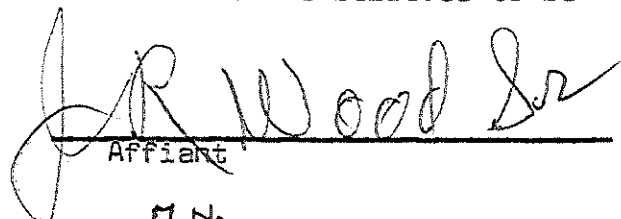
The allegations of the Complaint are untrue.



Attorney for Defendant.

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, personally appeared J. R. WOOD, SR., who being first duly sworn, deposes and says that he denies the correctness of the account and that he disputes the whole account, and states that he does not owe said account, and that this statement is made on reliable information that he believes to be true.



Affiant

Subscribed and sworn to before me this the 7th day of March, 1963.



Notary Public, Baldwin County, Alabama.

