

ALEXANDER FOREMAN, JR.
ATTORNEY AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
JOSEPH M. HOCKLANDER
GEORGE K. WILLIAMS, JR.

June 17, 1954

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

Re: Foreman & Foreman, Inc.
vs. Alabert F. Marsh
Case No. 2240


Dear Mrs. Duck:

Since the Sheriff returned the summons in the above styled cause marked "not found," I shall appreciate your issuing an alias summons. It is my information that this defendant operates the Oleander Cottages at Gulf Shores, Alabama. These cottages are located on the road which turns to the left just north of the Little Casino. I am enclosing a carbon copy of this letter for the use of Hon. Taylor Wilkins, Sheriff of Baldwin County, in serving this alias summons.

Your courtesy in this matter is appreciated.

Yours very truly,

ALEXANDER FOREMAN, JR.

By: 
George K. Williams, Jr.

GKWJr/wd
Encl.

STATE OF ALABAMA :

BALDWIN COUNTY :

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Albert F. Marsh to appear within thirty days from the service of this writ, in the Circuit Court, to be held for said County, at the place of holding the same, then and there to answer the complaint of Foreman & Foreman, Inc.

Witness my hand this 24th day of April, 1954.

Reice L. Smith
Clerk

FOREMAN & FOREMAN, INC.,
a corporation,

Plaintiff,

vs.

ALBERT F. MARSH,

Defendant.

: IN THE CIRCUIT COURT OF
:
: BALDWIN COUNTY, ALABAMA
:
: AT LAW
:
: NO. _____
:
:

COUNT ONE

The plaintiff claims of the defendant Ninety and 60/100 Dollars (\$90.60) due from him by account on, to-wit, the 18th day of March, 1953, which sum of money, with interest thereon, is still unpaid.

COUNT TWO

The plaintiff claims of the defendant Ninety and 60/100 Dollars (\$90.60) due from him by account stated on, to-wit, the 25th day of February, 1954, which sum of money with interest thereon is still unpaid.

Alexander Foreman Jr.
Attorney for Plaintiff

-2-

The account herein sued on is verified by affidavit.

Alexander Foreman Jr.
Attorney for Plaintiff

Defendant's Address:

Gulf Shores, Alabama
(Oleander Cottages)

STATE OF ALABAMA :

COUNTY OF MOBILE :

Beforeme, _____, a Notary Public in and for said county in said state, personally appeared John P. Stuart, who, after being by me first duly sworn, on oath deposes and says as follows:

That he is employed by the Plaintiff in that certain action now pending in the Circuit Court of Baldwin County, Alabama, and styled "Foreman & Foreman, Inc. vs. Albert F. Marsh", that he keeps the books of the original entry of the accounts of said Plaintiff; that the attached statement of accounts is a just, true and correct statement of account between said Foreman & Foreman, Inc. and Albert F. Marsh, and that the amount now due, owing and unpaid on said account, after allowing all just credits, set-offs and counter claims, is Ninety and 60/100 Dollars (\$90.60).

John P. Stuart
John P. Stuart

Subscribed and sworn to before me,
this _____ day of April, 1954.

FILED

4-24-1954

AUDIE L. BUCK, Clerk

Notary Public, Mobile County, Alabama

FOREMAN & FOREMAN, INC., a corporation

February 25, 1954

Mr. Albert F. Marsh
Gulf Shores Ala.

Balance as per statement rendered \$90.60

BALANCE \$90.60

100-22400
Duty Station

Foreman & Foreman
Inc. - a Corp.

VS

Albert F. March

TAYLOR WILKINS, Sheriff

By _____ D.S.

Moved to St. Petersburg
Fla.
←

born 28 day of April 1934

found in my county after August 1, 1954, in

By _____
Deputy Sheriff

By Edwards Stuckman
Deputy Sheriff

FILED
APR 24 1954
AUCIE A. BUCK, Clerk

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ATTORNEY AT LAW
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MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
JOSEPH M. HOCKLANDER
GEORGE K. WILLIAMS, JR.

April 22, 1954

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

Re: Foreman & Foreman, Inc.
vs. Albert F. Marsh

Dear Mrs. Duck:

Enclosed herewith you will please find, in duplicate, complaint which I shall appreciate your causing to be filed in the above styled matter. Please notify me when you obtain service and when the case is set.

Yours very truly,

ALEXANDER FOREMAN, JR.

By: *George K Williams Jr*
George K. Williams, Jr.

GKWJr/am
Encl.

ALEXANDER FOREMAN, JR.
ATTORNEY AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
JOSEPH M. HOCKLANDER
GEORGE K. WILLIAMS, JR.

April 22, 1954

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Circuit Court of Baldwin County
Court House
Bay Minette, Alabama

Re: Foreman & Foreman, Inc.
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Encl.

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BALDWIN COUNTY :

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Witness my hand this 24th day of April, 1954.

Alice J. Leach
Clerk

FOREMAN & FOREMAN, INC.,
a corporation,

Plaintiff,

vs.

ALBERT F. MARSH,

Defendant.

: IN THE CIRCUIT COURT OF
:
: BALDWIN COUNTY, ALABAMA
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: AT LAW
:
: NO. _____
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Alexander Foreman Jr.
Attorney for Plaintiff

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Alexander Foreman Jr.
Attorney for Plaintiff

Defendant's Address:

Gulf Shores, Alabama
(Oleander Cottages)

STATE OF ALABAMA :

COUNTY OF MOBILE :

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John P. Stuart
John P. Stuart

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Notary Public, Mobile County, Alabama

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JOSEPH M. HOCKLANDER
GEORGE K. WILLIAMS, JR.

June 17, 1954

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February 25, 1954

Mr. Albert F. Marsh
Gulf Shores Ala.

Balance as per statement rendered \$90.60

BALANCE \$90.60

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