

GULF FROSTED FOOD COMPANY,
A Corporation,

Plaintiff,

vs.

O. H. DOZIER, individually,
and doing business under the
trade name and style of SELECT
SEAFOOD & POULTRY COMPANY,

Defendant.

* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

*

AT LAW NO. 2383

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BOOK 002 PAGE 51

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendant the sum of FOUR HUNDRED SIXTY-SIX AND 61/100 DOLLARS (\$466.61), with interest thereon from, to-wit, February 15, 1954, for work and labor done for the defendant by the plaintiff on and prior to said date, at his request, which sum of money with the interest thereon is still unpaid.

COUNT TWO

Plaintiff claims of the defendant the sum of FOUR HUNDRED SIXTY-SIX AND 61/100 DOLLARS (\$466.61) as damages for deceit in that on and prior to February 15, 1954 the defendant stored certain seafood products with the plaintiff in plaintiff's cold storage plant at Foley, Alabama, and the defendant gave to the plaintiff a check dated on said date and in said amount in payment of the plaintiff's storage charges therefor, and in so doing, represented to the plaintiff that the said check was good and would be honored when presented at the bank on which it was drawn, and thereby induced the plaintiff to deliver said goods to the defendant, and in reliance upon said representations,

the plaintiff did on said date deliver said goods to the defendant, who transported them to Montgomery, Alabama and stopped payment on said check; thus the defendant has defrauded the plaintiff out of said storage charges and no part of said charges, the sum claimed herein, has been paid.

COUNT THREE

Plaintiff claims of the defendant the sum of FOUR HUNDRED SIXTY-SIX AND 61/100 DOLLARS (\$466.61) due on a check drawn by the defendant on a National Bank in the City of Montgomery, Alabama in said amount and on, to-wit, February 15, 1954, and payable to the order of the plaintiff, and payment of which was stopped by the defendant and is still due and unpaid, which the plaintiff claims herein, together with interest thereon.

J. E. Miller
Judge Miller, Circuit Court of Jackson

To the Sheriff:

The defendant may be served by branch summons to the Sheriff of Montgomery County, Alabama, who may serve the defendant personally at:

The Select Seafood & Poultry Company
Mill & Holt Streets
Montgomery, Alabama

FILED

9-11-54

ALICE J. DUCK, Clerk

1208 Received in Sheriff's Office
this 13 day of Sept, 1954
TAYLOR WILKIE, Sheriff

RECEIVED IN OFFICE
SEP 14 1954
G. A. MOSLEY, Sheriff

EXECUTED BY SERVING A
COPY OF THIS WITHIN
O. H. Dozier
Individually 1032
Select Sea Food &
Poultry Co.
9-14-54

G. L. Mosley
Sheriff Montgomery County
By Goodwin
Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2383

GULF FROSTED FOOD COMPANY,
A Corporation,

Plaintiff,

vs.

O. H. DOZIER, individually,
and doing business under the
trade name and style of SELECT
SEAFOOD & POULTRY COMPANY,

Defendant.

~~DEED~~ COMPLAINT

FILED
9-11-54
AUGIE L. DUCK, Clerk

INGE, TWITTY, ARMBRECHT & JACKSON
LAWYERS
MERCHANTS NATIONAL BANK BUILDING
P. O. BOX 1108
MOBILE 6, ALABAMA

INGE, TWITTY, ARMBRECHT & JACKSON
LAWYERS

WM. H. ARMBRECHT (1874-1941)
FRANCIS H. INGE, COUNSEL

THOS. E. TWITTY
WM. H. ARMBRECHT, JR.
THEO. K. JACKSON, JR.
RICHARD H. INGE
NICHOLAS S. MCGOWIN
JOHN W. MCCONNELL, JR.
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
THOS. E. TWITTY, JR.

MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA

MAILING ADDRESS:

P. O. BOX 1109
MOBILE 6, ALA.

CABLE ADDRESS:
ARMING

September 10, 1954

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

Re: Gulf Frosted Food Company,
A Corporation,

vs.

O. H. DOZIER, individually,
and doing business under the
trade name and style of SELECT
SEAFOOD & POULTRY COMPANY

Dear Mrs. Duck:

I am enclosing in duplicate Complaint in the
above styled cause. It will be appreciated if you
will file same in your court, and advise the date of
filing.

With kindest regards,

Cordially yours,



TET
ndu

Enclosures.

Greif Trusts Ford Co.
a Corp.

Plaintiff.

VS.

O.H. Dozier

Defendant.

IN THE CIRCUIT COURT

OF
Baldwin
MOBILE COUNTY, ALABAMA.

AT LAW.

NO. 2383.

NON-MILITARY AFFIDAVIT.

STATE OF ALABAMA

COUNTY OF MOBILE

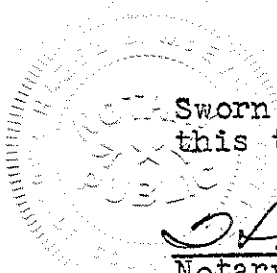
NOW comes, J.E. Witty, attorney for plaintiff,

who being first duly sworn, deposes and says that the defend-
ant herein, O.H. Dozier,

was not at the time of the filing of this suit, and is not now,
in the Military or Naval Service of the United States.

The Defendant resides at Montgomery, Alabama.

J.E. Witty,



Sworn to and subscribed before me;
this the 16th day of December

Lawrence B. McPhee
Notary Public, Mobile County, Alabama.

Filed _____,

CLERK.