

2699

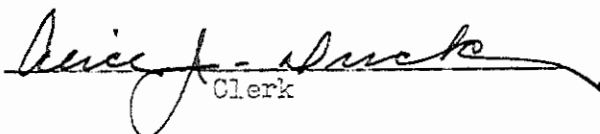
SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon CROCKETT WHITE, 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, Alabama, at Bay Minette, against CROCKETT WHITE, by FRANK STURGIS, JR., d/b/a MAGNOLIA MARINE SERVICE.

Witness my hand this the 16 day of August, 1955.


Clerk

COMPLAINT

FRANK STURGIS, JR., d/b/a
MAGNOLIA MARINE SERVICE,

PLAINTIFF

VS:

CROCKETT WHITE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT I

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 64/100 DOLLARS (\$319.64), due from him by account on, to wit: the 24th day of September, 1954, which sum of money, with interest thereon, is still unpaid.

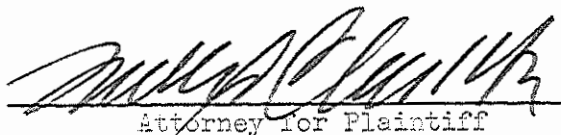
COUNT II

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 64/100 DOLLARS (\$319.64), due from him on account stated between the plaintiff and the defendant on, to wit: the 24th day of September, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III

The plaintiff claims of the defendant THREE HUNDRED NINETEEN & 64/100 DOLLARS (\$319.64), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 24th day of September, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, and itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 15th day of August, 1955.


Attorney for Plaintiff

The defendant lives at
Orange Beach, Ala.

AFFIDAVIT

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

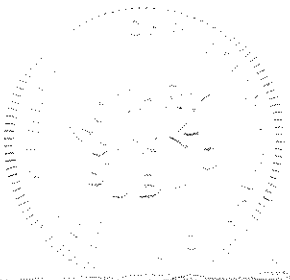
I, FRANK STURGIS III, first being duly sworn, deposes and says as follows:

My father, FRANK STURGIS, JR., is the sole owner of MAGNOLIA MARINE SERVICE, Foley, Alabama, and I am a salesman and bookkeeper of said business. I know that Crockett White of Orange Beach, Alabama, owes the Magnolia Marine Service, THREE HUNDRED NINETEEN & 64/100 DOLLARS (\$319.64), plus interest from September 24th, 1954, after allowing all just credits.

Frank Sturgis III

Sworn to and subscribed before me this 15th day of August, 1955.

Wm. H. Oliver
Notary Public
Baldwin County, Ala.



Received 16 day of Aug 1955
and on 17 day of Aug 1955
I served a copy of the within Q. R.
on _____

By service on Crockett White

TAYLOR WILKINS, Sheriff
By David Thomas, S.

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FRANK STURGIS, JR., d/b/a
MAGNOLIA MARINE SERVICE,

PLAINTIFF

VS:

CROCKETT WHITE,

DEFENDANT

Oxouph Beach

FILED

AUG 16 1955

ALICE J. DUCK, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

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FOREST A. CHRISTIAN
FOLEY, ALABAMA

2699

RECORDED

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

September 26, 1955

3324

Hon. H. M. Hall
Judge of Circuit Court
Bay Minette, Alabama

Re: Frank Sturgis, Jr., dba,
Magnolia Marine Service

vs: Crockett White
Case No. 2699

Dear Judge Hall:

Kindly render a Judgment by Default in this case for \$338.84.

It is based on an itemized and verified account.

Yours very truly,


FOREST A. CHRISTIAN