

LAW OFFICES  
JAMES A. BRICE  
FOLEY, ALABAMA

JAMES A. BRICE  
RICHARD C. LACEY

P. O. Box 298  
WHITCHALL 3-3601

October 8, 1959

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

Re: Frank Sturges, et al  
vs: J. V. Hudson  
Law 3875

Dear Mrs. Duck:

Please dismiss this complaint and send us a cost  
bill.

Thank you.

Very truly yours,

  
James A. Brice

JAB/vd

cc: Magnolia Marine Service  
Foley, Alabama

SUMMONS

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA.....GREETINGS:

You are commanded to summons James Hudson to appear before the Circuit Court, to be held for said County at the place of holding same, within Thirty (30) days from service of this process then and there to answer the complaint of Frank Sturges and Frank Sturges III, a co-partnership D/B/A Magnolia Marine Service.

*witness my hand this 15th day of June 1955*  
*E. H. 9-17-59*

COMPLAINT

FRANK STURGES AND FRANK  
STURGES III, a co-partnership  
D/B/A MAGNOLIA MARINE SERVICE

PLAINTIFF

VS

JAMES HUDSON

DEFENDANT

IN THE CIRCUIT COURT  
OF BALDWIN COUNTY,  
ALABAMA,  
AT LAW

I

The Plaintiff claims of the Defendant One Hundred Five Dollars and eighty-four cents (\$105.84), due from him on account, to-wit: the 15th day of June 1955, which sum of money, with interest thereon, is still unpaid

II

The Plaintiffs claim of the Defendant One Hundred and Five Dollars and eighty-four cents (\$105.84), due from him for mer-

chandise, goods and chattles sold by the Plaintiffs to the Defendant on, to-wit: the 15th day of June 1955, which sum of money, with interest thereon, is still unpaid.

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JAMES A. BRICE

  
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part thereof an itemized statement of account verified by affidavit of Frank Sturges III, a competent witness, sworn to before a Notary Public which statement shows the amount due on this account as of the 15th day of June 1955, and due at the present.

The defendant resides at Orange Beach, Alabama

# MAGNOLIA MARINE SERVICE

P. O. BOX 1666

PHONE Whitehall 3-4771

Foley, Ala. March 24, 1958

In account with

. James Hudson,  
Orange Beach,  
Alabama.  
.

All accounts are due and payable tenth of month following date of purchase

Date	Detail	Debit	Credit	Balance
1953				
Jan, 1	Balance due			197.45
16	38764	5.12		202.57
Jun. 24	5137	4.47		207.04
Aug. 12	CM 5700		20.00	187.04
1954				
Feb. 6	Cash		20.00	167.04
Mar. 16	"		10.00	157.04
May 13	Cash		25.00	132.04
1955				
May 27	Cash		25.00	107.04
Jun. 15	CM 1412		1.20	105.84

AFFIDAVIT

STATE OF ALABAMA )  
BALDWIN COUNTY )

Before me, Richard C. Lacey, a Notary Public in and for said County, in said State personally appeared Frank Sturges III who, being by me first duly sworn, deposes and says; that he is a co-partner of the Magnolia Marine Service; that the annexed statement of the account of said Magnolia Marine Service against James Hudson is just, true and correct; that there is now due on said account One Hundred Five Dollars and eighty-four cents (\$105.84) after deducting all credits, set-offs or counterclaims.

Frank Sturges III  
FRANK STURGES III

Sworn to and subscribed before me this 15<sup>th</sup> day of June, 1959. Witness my hand and official seal.

Richard C. Lacey  
NOTARY PUBLIC

[illegible]

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*[Faint, illegible handwritten notes]*

2000

Frank Sturgeon  
vs.  
James Hudson

**FILED**

44-38861-100

ALICE J. DUCK, CLERK  
REGISTER

Sheriff claims 120 miles at  
Ten Cents per mile Total \$ 12.00  
TAYLOR WILKINS, Sheriff  
BY C. J. Wilkins  
DEPUTY SHERIFF

Received 18 day of Feb

rd on 17 day of Sept 23

received a copy of the within

James Madison

By service on

TAYLOR WILKINS &amp; GREENE

02

Orange Beach