

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

January 13, 1960

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

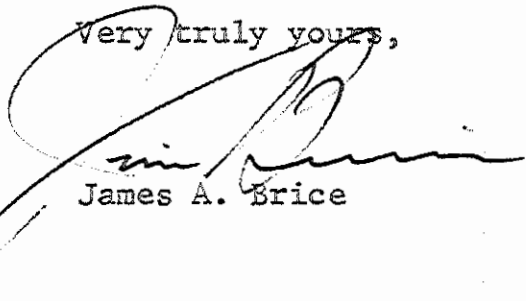
Re: Peoples Fertilizer Company  
vs: Frank Soesbe, Jr.  
Law 3915

Dear Mrs. Duck:

Please place this file before Judge Hall for judgment for plaintiff by default for \$286.08, plus \$65.80 interest, a total of \$351.88.

The suit was on verified and itemized statement of account. Please send me a certified copy of the judgment.

Very truly yours,



James A. Brice

JAB/vd

cc:Peoples Fertilizer Company  
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.....GREETING:

You are commanded to summons Frank Soesbe Jr. 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 Peoples Fertilizer Company, a corporation.

*witness my hand this 27 day of July 1959*  
*Lucile J. Henrich*  
*clerk*

*84-12-9-59*

COMPLAINT

PEOPLES FERTILIZER COMPANY, a )  
corporation - Plaintiff )  
VS )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

FRANK SOESBE, JR. )  
DEFENDANT )

AT LAW

I.

The Plaintiff claims of the Defendant Two Hundred Eighty Six Dollars and Eight Cents (\$286.08) , due from him on account, to-wit: the 3rd day of February, 1955 which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant Two Hundred Eighty Six Dollars and Eight Cents (\$286.08), due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant on, to-wit the 3rd day of February, 1955, which sum of money, with interest thereon is still unpaid.

*James A. Brice*  
JAMES A. BRICE

*Richard C. Lacey*  
RICHARD C. LACEY

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ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part thereof an itemized statement of account verified by affidavit of Chan Smith, a competent witness, sworn to before a Notary Public which statement shows the amount due on this account as of the 3rd day of February, 1955 and due at the present.

The Defendant resides at Foley, Alabama.

Mr. Frank Soesbe, Jr.

Foley, Alabama

IN ACCOUNT WITH

**PEOPLES FERTILIZER CO.**

## HIGH GRADE FERTILIZER

FOLEY, ALA.

PHONE WH 3-4201

1955

|        |      |                       |          |        |        |
|--------|------|-----------------------|----------|--------|--------|
| 3-1    | 2218 | 4.00 tons             | 4-10-7 P | 143.04 | 286.08 |
| 3-2    | 2304 | 4.00 tons             | 4-10-7 P | 143.04 |        |
|        |      | 8.00 tons             |          |        | 17.16  |
| 5-1-56 |      | Interest 1 year at 6% |          |        | 303.24 |
|        |      |                       |          |        | 18.19  |
| 5-1-57 |      | Interest 1 year at 6% |          |        | 321.43 |

AFFIDAVIT

STATE OF ALABAMA )  
(  
BALDWIN COUNTY )

Before me, Richard C. Lacey, a Notary Public in and for said County in said State personally appeared Chan Smith, who being by me first duly sworn, deposes and says : that he is the General Manager of Peoples Fertilizer Company; that the annexed statement of the account of said Peoples Fertilizer Company against Frank Soesbe Jr., is just, true and correct; that there is now due on said account Two Hundred Eighty Six Dollars and Eight Cents (\$286.08) after deducting all credits, set-offs and counterclaims.

*Chan Smith*

CHAN SMITH

Sworn to and subscribed before me this 22 day of July, 1959.  
Witness my hand and official seal.

*Richard C. Lacey*

NOTARY PUBLIC

Received 27 day of July 1959  
and on 9 day of Dec 1959  
served a copy of the within 89C  
on Frank Soesbe, Jr.  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Richard C. Lacey D. S.

Julian

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY CC  
DEPUTY SHERIFF

SUMMONS

FRANK SOESBE, JR.

COMPLAINT

PEOPLES FERTILIZER COMPANY

VS

FRANK SOESBE, JR.

FILED

JUL 27 1959

WILL DUCK, CLERK  
REGISTER

LAW OFFICES OF  
JAMES A. BRICE  
RICHARD C. LACEY  
FOLEY, ALABAMA