

B916

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 hereby commanded to summons Freddie Dugger 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 Robert E. Braden.

Witness my hand this 29 day of July, 1957

Benjamin J. Brice
CLERK

292

COMPLAINT

ROBERT E. BRADEN
Plaintiff -)
VS -)
FREDDIE DUGGER
Complainant -)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I.

The Plaintiff claims of the Defendant One Hundred Forty & NO/100 Dollars, due from him on account, to wit: the 30th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Forty & NO/100 Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 30th day of July, 1956, which sum of money, with interest thereon, is still unpaid.

James A. Brice
JAMES A. BRICE

Richard C. Lacey
RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Robert E. Braden, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 30th day of July, 1956.

Defendant resides at Summerdale, Alabama.

LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. Box 298
WHITEHALL 3-3601

October 6, 1959

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

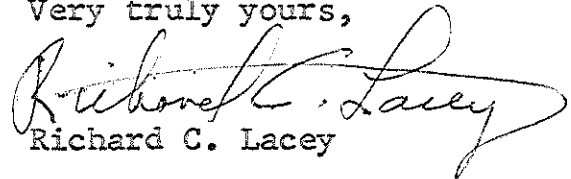
Re: Various vs. Freddie & Twila Dugger

Dear Mrs. Duck:

I am sorry I was not more specific in my letter of September 21st. I desired to have both cases, that is, No. 3916 and 3158 against the Duggers dismissed.

Hoping this clears this matter up, I am

Very truly yours,


Richard C. Lacey

RCL/vd

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Witness my hand this 27 day of July, 1959

James A. Brice
CLERK

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Plaintiff -)
VS -)
FREDDIE DUGGER
Complainant -)

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ATTORNEYS FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Robert E. Braden, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 30th day of July, 1956.

Defendant resides at Summerdale, Alabama.

State of NEBRASKA

AFFIDAVIT
and
ASSIGNMENT

County of Buffalo

ss

Robert E. Braden

being first duly sworn deposes and says

that ... he is an individual of the firm of _____

_____ which is a _____

_____ composed of _____

doing business in the County and State aforesaid, and that the attached statement of account against Freddie Dugger designated as Exhibit "A" by the Notary, is correctly copied from the books of original entry of Robert E. Braden

_____ that the charges were made in said books at or about the time of their respective dates, that the charges are for goods, wares, and merchandise sold and delivered or services rendered and performed as appears from the attached statement, that the charges are correct and the account is just and true as stated and there is now due and owing hereon.

The sum of One hundred forty and no/100 Dollars, (\$ 140.00) with lawful interest thereon, that no part has been paid or in any manner settled and that there are no deductions or offsets of any kind, except as herein specified and credited, and that for valuable consideration, receipt whereof is hereby acknow-

~~ledged, this said account in the sum of \$ _____ is hereby assigned, transferred and set over unto _____ with full power and the authority to do and perform all acts necessary for the collection, settlement, adjustment, compromise, or satisfaction of said claim, either in the name of the undersigned or in his or her name.~~

Witness this 18 day of May A.D. 195 9

Robert E. Braden
Individual Name

ROBERT E. BRADEN
Firm Name

Subscribed and sworn to before me this 18 day of May 195 9

In testimony whereof, I have hereunto set my hand and official seal the day and year aforesaid.

Received 27 day of July 1952

and on _____ day of _____ 19

I served a copy of the within 29C

on Freddie Dugger

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Not Found

Returned 3 day of Sept 1952

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By *Chadwick*
Deputy Sheriff

no. 3916

D. L. W.

S U M M O N S

FREDDIE DUGGER

C O M P L A I N T

ROBERT E. BRADEN

VS

FREDDIE DUGGER

FILED

JUL 27 1952

ALICE L. DUCK, CLERK
REGISTER

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