

J. A. PILGRIM

PLAINTIFF

VS

MICHAEL J. KAISER AND JOHN KAISER,  
Individually and d/b/a MIKE KAISER & SONS,  
a co-partnership

DEFENDANTS

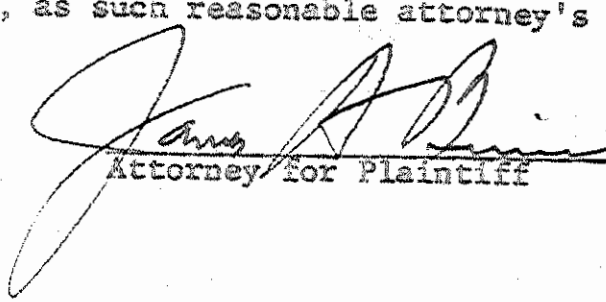
) IN THE CIRCUIT COURT  
) OF BALDWIN COUNTY,  
) ALABAMA, AT LAW

COMPLAINT

The Plaintiff claims of the Defendants the sum of Three Thousand Ninety-five and 56/100 (\$3095.56) Dollars, due by promissory note made by the Defendants on the 3rd day of April 1958, and payable on the 3rd day of July 1958, with interest from July 29, 1959, at the rate of 6% per annum.

Plaintiff avers that in and by the terms of said note the Defendants waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the Defendants agreed to pay all cost of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the Plaintiff further claims of the Defendants the further and additional sum of Six Hundred Fif and NO/100 (\$650.00) Dollars, as such reasonable attorney's fee.

  
Attorney for Plaintiff

FILED

AUG 16 1961

ALICE J. DUCK, CLERK  
REGISTER

AFFIDAVIT

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

ROBERT GRIMES, first being duly sworn, deposes and says as follows:

My name is Robert Grimes and I am the owner and manager of Grimes Grocery Store, Gulf Shores, Alabama. I do hereby certify that Sam Lochirco owes to said Grimes Grocery Store, a balance of TWO HUNDRED THIRTY-TWO & 35/100 DOLLARS (\$232.35, after allowing all just credits.

*Robert Grimes*

Robert Grimes

Sworn to and subscribed to before  
me this the 10th day of August, 1961.

*Janice L. Childress*

Notary Public  
Baldwin County, Alabama

JANICE L. CHILDRESS, Notary Public  
Baldwin County, Alabama  
My Commission Expires 7/13/65

AFFIDAVIT

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

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*Janice L. Childress*  
Notary Public

Baldwin County, Alabama

JANICE L. CHILDRESS, Notary Public  
Baldwin County, Alabama  
My Commission Expires 7/10/65

SUMMONS

THE STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon SAM B. LOCHIRCO, 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 the place of holding same by ROBERT GRIMES, doing business as GRIMES GROCERY STORE.

Witness my hand this the 15th day of August, 1961.

Alice J. Duck  
Clerk

\* \* \* \* \*

COMPLAINT

ROBERT GRIMES, doing business as)  
GRIMES GROCERY STORE, )  
PLAINTIFF )  
VS: )  
SAM B. LOCHIRCO, )  
DEFENDANT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT I:

The plaintiff claims of the defendant TWO HUNDRED THIRTY-TWO & 35/100 DOLLARS (\$232.35), due from him by account on, to wit: the 11th day of March, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendant TWO HUNDRED THIRTY-TWO & 35/100 DOLLARS (\$232.35), due from him on account stated between the plaintiff and the defendant on, to wit: the 11th day of March, 1961, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendant TWO HUNDRED THIRTY-TWO & 35/100 DOLLARS (\$232.35), due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 11th day of March, 1961, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an 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 10th day of August, 1961.

July 1961  
Attorney for Plaintiff

The defendant's address is:  
Mimosa Place  
Foley, Alabama

FILED

AUG 15 1961

ALICE J. DUCK, CLERK  
REGISTER