

COMPLAINT

PAUL LaRUE, individually
and d/b/a LaRue Flying Service,
Inc., a corporation

Plaintiff

VS

Frank Kaiser

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3522

I

The plaintiff claims of the defendant the sum of Three Hundred Twelve and no/100(\$312.00)Dollars, due from him on account, to-wit: the 20th day of August, 1957, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant Three Hundred Twelve and no/100(\$312.00)Dollars, due from him for merchandise, goods, services and chattels sold by the plaintiff to the defendant on, to-wit: the 20th day of August, 1957, which sum of money, with interest thereon, is still unpaid.

James A. Babin
Attorney for Plaintiff

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Paul LaRue, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 20th day of August, 1957, and due at present.

The defendant lives at Elberta, Alabama.

FILED

MAR 25 1963

ALICE I. DUKK, CLERK
REGISTERED

312	312
3	94
<hr/>	<hr/>
93.6	406

AFFIDAVIT

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, The undersigned, a Notary Public in and for said County and State, personally appeared Paul LaRue, who being by me first duly sworn, deposes and says: that he is the president of LaRue Flying Service, Inc., a corporation that the annexed statement of account of the said LaRue Flying Service, Inc., a corporation, against Frank Kaiser, is just, true and correct; that there is now due on said account Three hundred Twelve and no/100(\$312.00)Dollars after deducting all credits, set/offs or counterclaims.

Paul LaRue

Sworn and subscribed before me on this the 21 day of March, ~~1962~~. 1963.

James A. Quinn
Notary Public, Baldwin County, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Frank Kaiser

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, State of Alabama, at Bay Minette, against Frank Kaiser,-----

-----, Defendant---

by Paul LaRue, individually and d/b/a LaRue Flying Service, Inc, a corporation

-----, Plaintiff---

Witness my hand this 25 day of March 1963

E. J. - 5-4-63 Alice J. Luck, Clerk

No. 5522

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Paul La Rue ind. & Al
La Rue Flying Service
Plaintiffs

vs.

Frank Kaiser
Defendants

Summons and Complaint

Filed _____ 19____

FILED

MAR 25 1963

Clerk

ALICE J. DUCK CLERK
REGISTER

James A. Brice
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

March 25 1963

_____, Sheriff

I have executed this summons

this May 4 1963

by leaving a copy with

Frank Kaiser

Sheriff's claims 7.20 made at _____

Total Com. Per. only Total 7.20
TAYLOR WILKINS, Sheriff

BY _____

DEPUTY SHERIFF

Taylor Wilkins Sheriff
Verlue Chase Deputy Sheriff

Deputy

LaRUE FLYING SERVICE, INC.

P. O. Box 55

SUMMERDALE, ALABAMA

M frank KaiserElberta, Ala.TELEPHONE:
OFFICE WH 3-6168

P. O. BOX 964

TELEPHONE:
RES. WH 3-4088

8-6-57	76 acres Leno @	2.00	152.00
2-20-57	80 " " " "	2.00	160.00
			<u>312.00</u>