

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons OTIS MINOR, 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 PAUL LA RUE, d/b/a LA RUE FLYING SERVICE.

Witness my hand this 10 day of November, 1964.

Alice J. Duck
Clerk

* * * * *

COMPLAINT

PAUL LA RUE, d/b/a LA RUE
FLYING SERVICE,

PLAINTIFF,

VS:

OTIS MINOR,

DEFENDANT..

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 67-95

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHT & 75/100 DOLLARS (\$208.75), due from him by account on, to wit: the 1st day of September, 1964, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHT & 75/100 DOLLARS (\$208.75), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of September, 1964, which sum of money with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHT & 75/100 DOLLARS (\$208.75), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of September, 1964, 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 7th day of November, 1964.

Paul La Rue
Attorney for the Plaintiff

Defendant's address:

Intersection of Marlow Road
and Klumpp Road.

EX-11-19-64

FILED

ALICE J. DUCK, CLERK
REGISTER

AFFIDAVIT

STATE OF ALABAMA,)

BALDWIN COUNTY.)

I, PAUL LA RUE, first being duly sworn, deposes and says as follows: OTIS MINOR of Fairhope, Alabama, owes the LA RUE FLYING SERVICE the amount of TWO HUNDRED EIGHT & 75/100 DOLLARS (\$208.75), for spraying soy beans by airplane on the following dates:

August 1963 August 1964

Paul La Rue
Paul La Rue

Sworn to and subscribed before me on
this the 7th day of November, 1964.

Notary Public

no. 6295

SUMMONS

PAUL LA RUE, doing business as,
LA RUE FLYING SERVICE,

PLAINTIFF,

VS:

OTIS MINOR,

DEFENDANT.

received 10 day of Nov 1964
and on 19 day of Nov 1964
served a copy of the within to
on Otis Minor

By service on Otis Minor
Taylor Wilkins
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Clay City

80 miles in
8.00
RP

FILED
NOV 21
ALICE L. DUCK, CLERK
REGISTRAR

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

PAUL LA RUE, d/b/a LA RUE
FLYING SERVICE,

Plaintiff,

vs.

OTIS MINOR,

Defendant.

)
)
)
)
)
)
)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6295

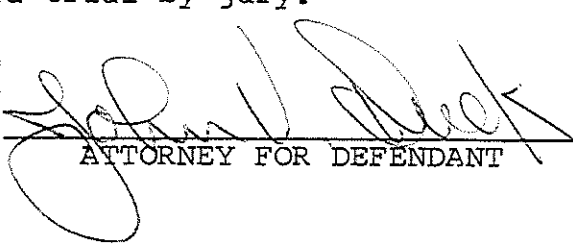
D E M U R R E R

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein and assigns as grounds therefor, the following:

1. That said Bill of Complaint does not properly itemize the said account sued on.
2. The Bill of Complaint does not have an itemized and verified statement of the account as alleged in the Bill of Complaint.


ATTORNEY FOR DEFENDANT

The Defendant respectively demands
a trial by jury.


ATTORNEY FOR DEFENDANT

FILED

DEC 2 1964

ALICE J. DUCK, CLERK
REGISTER