

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

March 4, 1965

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck: Re Langston Bag Co. of Mississippi,
Incorporated, a corporation
vs John Kaiser, et al

I am enclosing Summons and Complaint in the above
styled cause to be served on the defendants in Elberta,
Alabama.

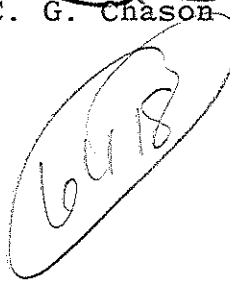
Yours very truly,



C. G. Chason

CGC:dc

Encls 6



STATE OF ALABAMA)
) IN THE CIRCUIT COURT . . LAW SIDE .
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon JOHN KAISER, JOHN KAISER, JR., TOM KAISER, ROGER J. KAISER and HERBERT KAISER, doing business as THE JOHN KAISER & SONS COMPANY, a partnership, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of LANGSTON BAG CO. OF MISSISSIPPI, INCORPORATED, a corporation.

WITNESS my hand this the 5 day of March, 1965.

Bine J. Neuch
Clerk

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COMPLAINT

LANGSTON BAG CO. OF)	
MISSISSIPPI, INCORPORATED,)	
a corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
VS.)	
)	LAW SIDE
JOHN KAISER, JOHN KAISER, JR.,)	
TOM KAISER, ROGER J. KAISER,)	
and HERBERT KAISER, doing)	
business as THE JOHN KAISER)	
& SONS COMPANY, a partnership,)	
)	
Defendants.)	

COUNT ONE

The Plaintiff claims of the Defendants SIX THOUSAND, FIVE HUNDRED FORTY-ONE and 65/100 DOLLARS (\$6,541.65) for merchandise, goods and chattels sold by the Plaintiff to the Defendants on the 25th day of May, 1964, the 5th day of June, 1964, and the 9th day of June, 1964, all in accordance with the verified account attached hereto and specifically made a part hereof, which sum

of money with interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendants SIX THOUSAND, FIVE HUNDRED FORTY-ONE and 65/100 DOLLARS (\$6,541.65) due on a check signed in behalf of the Defendant, The John Kaiser & Sons Company, by John Kaiser, the Defendants, on the 1st day of December, 1964, in the sum of SIX THOUSAND, FIVE HUNDRED FORTY-ONE and 65/100 DOLLARS (\$6,541.65), payable to the Plaintiff at the Farmers & Merchants Bank of Foley, Alabama, and accepted by the Plaintiff, was endorsed and presented by the Plaintiff for payment and was returned to the Plaintiff by said Farmers & Merchants Bank of Foley, Alabama because of insufficient funds, which sum of money, with interest thereon, is due and unpaid.



Attorney for Plaintiff

FILED

MAR 5 1965

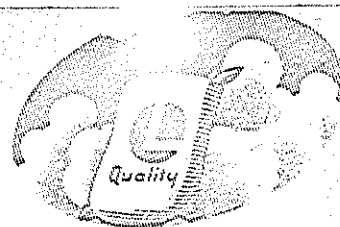
RECEIVED

64-3-8-65

Langston Bag Co.

OF MISSISSIPPI
INCORPORATED

BURLAP • COTTON BAGS • BAGGING
TIES • PATCHES AND TWINE •
PHONE 354-2394



117 WESLEY (COR. NO. MILL ST.) • P. O. BOX 442 • JACKSON, MISSISSIPPI

INVOICE DATE 5/28/64

DATE ENTERED	SALESMAN	TERMS	CONTRACT	YOUR CONTRACT	INVOICE NO.
5/25/64	SHARPE	NET 10 DAYS			3935

SOLD TO • THE JOHN KAISER & SONS COMPANY
FOLEY, ALABAMA

SHIP TO

• SAME

YOUR ORDER NO.	DATE SHIPPED	F.O.B.	ROUTING	B.O. TO INV. NO.	B.O. FROM INV. NO.
JOHN KAISER	5/28/64	FOLEY	OUR TRUCK BL-4169		

QUANTITY	SIZE	DESCRIPTION	PRICE	AMOUNT
10,058	36 CUT 48	NEW 7 OZ. LANG-BRITE BURLAP BAGS PRINTED 153C 100% SUPERIOR QUALITY POTATOES	\$168.90/M	\$1,698.80
9,840	30 CUT 38	NEW 6 1/2 OZ. LANG-BRITE BURLAP BAGS PRINTED 153C 50% SUPERIOR QUALITY POTATOES	125.26/M	1,231.97 \$2,930.77
<p>SIGNED FOR IDENTIFICATION</p> <p><i>R.E. Langston</i> R.E. LANGSTON</p> <p>THANK YOU</p> <p>THURSDAY-FRIDAY</p>				

Langston Bag Co.

OF MISSISSIPPI
INCORPORATED

BURLAP • COTTON BAGS • BAGGING
TIES • PATCHES AND TWINE •
PHONE 354-2364



117 WESLEY (COR. NO. MILL ST.) • P. O. BOX 442 • JACKSON, MISSISSIPPI

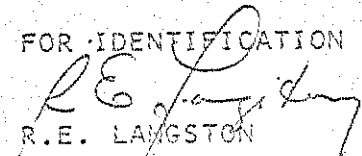
INVOICE DATE 6/5/64 6/9/64

DATE ENTERED	SALESMAN	TERMS	CONTRACT	YOUR CONTRACT	INVOICE NO.
6/3/64	SHARPE	NET 10 DAYS			3961

SOLD TO THE JOHN KAISER & SONS COMPANY
FOLEY
ALABAMA

SHIP TO

SAME

YOUR ORDER NO.	DATE SHIPPED	F.O.B.	ROUTING	B.O. TO INV. NO.	B.O. FROM INV. NO.
	6/5, 6/9/64	FOLEY	OUR TRUCK BL-4201, 4213		
QUANTITY	SIZE	DESCRIPTION		PRICE	AMOUNT
20,271	36 CUT 48	NEW 7 OZ. LANG-BRITE BURLAP BAGS, PRINTED 1S3C 100# SUPERIOR QUALITY POTATOES		\$168.90/M	\$3,423.77
243#		10 PLY COTTON HAND SEWING TWINE		\$.77/LB	<u>187.11</u> \$3,610.88
THANK YOU					
SIGNED FOR IDENTIFICATION					
 R.E. LANGSTON MONDAY					
231					

PAYABLE IN NEW YORK OR JACKSON EXCHANGE

STATE OF MISSISSIPPI

AFFIDAVIT

HINDS COUNTY

Before me, Esther R. Deming, a Notary Public in and for said County in said State, personally appeared R. E. Langston, who is known to me, and who, after being by me first duly and legally sworn, deposes and says under oath as follows:- That his name is R. E. LANGSTON; that he is MANAGER of Langston Bag Co. of Mississippi, Incorporated, and as such official, is familiar with the books and records of said corporation; that attached hereto are copies of invoices of Langston Bag Co. of Mississippi, Incorporated, numbers 3935 and 3961, showing shipment to The John Kaiser & Sons Company of Foley, Alabama on May 25, 1964, June 5, 1964 and June 9, 1964, burlap bags and cotton hand sewing twine in the amount and at the prices shown on the copies of said invoices, to a total sale price of Six Thousand, Five Hundred Forty-one and 65/100 Dollars (\$6,541.65); that these copies of invoices reflect the amounts due to Langston Bag Co. of Mississippi, Incorporated, for the merchandise shipped to the John Kaiser & Sons Company of Foley, Alabama on the order of the said John Kaiser & Sons Company; that the attached copies of invoices reflect the true and correct amount due to Langston Bag Co. of Mississippi, Incorporated by The John Kaiser & Sons Company of Foley, Alabama; that there is due to Langston Bag Co. of Mississippi, Incorporated the sum of Six Thousand, Five Hundred Forty-one and 65/100 Dollars (\$6,541.65) with the interest thereon legally chargable, after deducting any and all credits, setoffs or counter claims.

Sworn to and subscribed before me on this 12 day of February, 1965.

(affix Seal)

Esther R. Deming
Notary Public, Hinds County
State of Mississippi

No. 6418

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

LANGSTON BAG CO. OF MISSISSIPPI
INCORPORATED, a corporation

Plaintiff

- vs -

JOHN KAISER, ET AL,

Defendants

Received 5 day of March 1965
on 8 day of March 1965
Received a copy of the within Summons
John Kaiser, John
Kaiser, Jr., Tom Kaiser
service on Roger J. Kaiser
The above
TAYLOR WILKINS, Sheriff
By Jm Eastman D. S.
Elberta

Received 5 day of March 1965
on 8 day of March 1965
Received a copy of the within Summons
The John Kaiser &
Sons Co.
service on Herbert Kaiser
The above
TAYLOR WILKINS, Sheriff
By Jm Eastman D. S.
Elberta, Ala

98 on Rt where Busk Bldg.

Sheriff claims 4.20 miles at

Ten Cents per mile Total \$ 42.00

TAYLOR WILKINS, Sheriff

BY Jm Eastman
DEPUTY SHERIFF

FILED

MAR 5 1965

ANGEL DUK, CLERK
REGISTER

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA