

~~STATEMENT~~

JAMES W. HOWELL  
ATTORNEY AT LAW  
FOLEY, ALABAMA 36535

POST OFFICE BOX 206

AREA CODE 205-943-3602

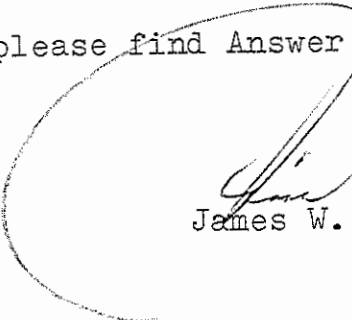
July 18, 1967

Mrs. Alice Duck  
Circuit Clerk  
Baldwin County  
Bay Minette, Alabama

RE: Case No. 7587

Dear Mrs. Duck:

Enclosed please find Answer in the above referenced case.

  
James W. Howell

JWH:ec  
enc:

LOUISVILLE & NASHVILLE  
RAILROAD COMPANY, A  
Corporation,

Plaintiff,

VS.


JOHN KAISER, Individually  
and doing business as  
JOHN KAISER & SONS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW, NO. 7587

Comes the Defendant in the above style cause and for  
answer thereto, pleads nil debit.

  
Attorney for Defendant.

Defendant respectfully demands a trial by jury in  
this cause.



**FILED**

JUL 21 1967

**ALICE J. DUCK** CLERK  
REGISTER

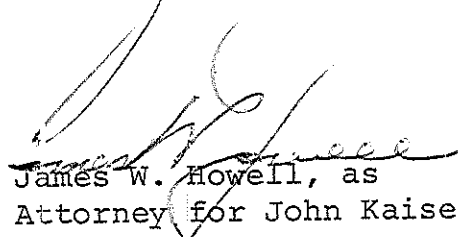
September 18, 1967

Honorable Telfair J. Mashburn  
Circuit Judge  
Bay Minette, Alabama

Dear Judge Mashburn:

As attorney for the Defendant, John Kaiser, individually and doing business as John Kaiser & Sons, in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, At Law, number 7587, wherein Louisville & Nashville Railroad Company, a corporation, is the Plaintiff, I do hereby withdraw the jury demand filed by the Defendant in said cause and consent that judgment may be entered against said Defendant for the amount claimed in the Plaintiff's complaint without further notice to the Defendant.

Yours very truly,

  
James W. Howell, as  
Attorney for John Kaiser  
& Sons

*Filed*  
*9-21-67*  
*Reice French*  
*clerk*

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John Kaiser, individually and doing business as John Kaiser & Sons, to appear within thirty 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 Louisville & Nashville Railroad Company, a corporation.

Witness my hand this 26 day of June, 1967.

Alice A. Duck  
Clerk

LOUISVILLE & NASHVILLE  
RAILROAD COMPANY, A  
Corporation,

Plaintiff,

vs.

JOHN KAISER, Individually  
and doing business as  
JOHN KAISER & SONS,

Defendant.

X

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2587

COUNT ONE:

The Plaintiff claims of the Defendant Six Thousand, Five Hundred and Sixty-six Dollars and Ninety-six Cents (\$6,566.96) due from him by account on the 1st day of March, 1966, which sum of money is still unpaid.

CHASON, STONE & CHASON

FILED

JUN 26 1967

ALICE L. DUCK, CLERK  
REGISTER

By:

John Earle Chason  
Attorneys for Plaintiff

13th  
MAY

#7587

Received 26 June '67

Served 28 June '67

SSC on  
John Kaiser Sons  
Taylor Wilkins, Sheriff  
Jm Eastman, D.S.  
Elberta, Ala.

LOUISVILLE & NASHVILLE RAIL-  
ROAD COMPANY, A Corporation,

Plaintiff,

vs.

JOHN KAISER, individually and  
doing business as JOHN KAISER &  
SONS, Elberta, Ala.

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. 2587

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

Sheriff claims 84 miles at  
Ten Cents per mile Total \$ 8.40  
TAYLOR WILKINS, Sheriff  
BY De.  
DEPUTY SHERIFF

FILED  
JUN 26 1967  
CLERK REGISTER