AAA AIR SERVICE, INC.)
a corporation,	IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS:	AT LAW
OTIS MINOR, JR.,)
)
Defendant)

Comes now the Defendant in the above styled cause and files this his demurrer to said cause and to each and every count thereof.

- 1. That the Bill of Complaint does not state a cause of action.
- 2. That said Bill of Complaint does not sufficiently state matters to appraise the Defendant that which is sued for.
- 3. That said Defendant cannot ascertain from said Bill of Complaint the matters complained of.
- 4. That said Bill of Complaint alleges that the account was evidenced by an itemized and verified statement of account and, in fact, no such itemized and verified statement of the account was attached to said Bill of Complaint.

RICHARD C. LACEY Attorney for Defendant

I do hereby certify that I have on this 14th day of October, 1968, served a copy of the foregoing pleading on John V. Duck, 319 Magnolia Avenue, Fairhope, Alabama by mailing the same by United States mail, properly addressed, and first class postage prepaid.

OCT 16 1968

ALCE J. DURK CLERK REGISTER

AAA AIR SERVICE, INC., a corporation,

Plaintiff,

vs.

OTIS MINOR, JR.

Defendant.

Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY-THREE AND 68/100 (\$333.68) DOLLARS due from him by open account from on, to-wit: the 29th day of May, 1965 until on, to-wit: the 28th day of March, 1966, which sum of money with the interest thereon is still unpaid.

ATTORNEY FOR PLAINTIFF

NOTE: The account sued on is hereby evidenced by an itemized and verified statement of the account.

SEP 3 0 1968

ALGE J. DUCK CLERK REGISTER

STATE OF ALABAMA COUNTY OF BALDWIN

Be it remembered, that on this ____day of___ 1968, personally appeared before em, the undersigned authority, SAMUEL WITZNADEL, known to me, who being duly sworn, on his oath stated that he is Manager of AAA AIR SERVICE, INC., a corporation organized and doing business under the laws of the State of Alabama, and that as such he makes this affidavit; that he is familiar with the books and business of AAA AIR SERVICE, INC.; that the attached account against OTIS MINOR, JR. of Fairhope, Alabama is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said OTIS MINOR, JR. at his special instance and request, that credit has been duly given for all payments and just and lawful offsets to which said is entitled as thereon stated, and that the balance thereof, amounting to the sum THREE HUNDRED THIRTY-THREE AND 68/100 (\$333.68) DOLLARS with interest from the 28th day of March, 1966 is justly due and remains unpaid.

Sworn to and subscribed before me on this the 27 h day of

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JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at Marlow Road Fairhope, Alabama

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AAA AIR SERVICE, INC. MUNICIPAL AIRPORT FAIRHOPE, ALABAMA

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	S	ept.	30	19_66	
O_Mr.	Otis Minor	¥7	- 0		
TREET_B	oute 2, Box 68				
	rhope, Alabama ZONE		STATE_		
TERMS				121	
Sept.	Balance			343	68
	Please make some arr	angem	ents		
	for paying this acco	unt.			
	If we do not hear fr	11			
	you within 10 days,	the			
	account will be turn	ned of	/er		
	to a lawyer				

TO_			JUL	y 31	19 66	7
	M	h. Otis Minor				
STRE	ET_R	oute 2, Box 68				
CIT	'air	hope, Alabama ZONE		STATE		_
TERM		ZONL		_STATE_		-
TLKIV	I.S					
July	1	Balance			P 58	68
July	4	Paid on Account	15	00	343	68
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FROM	A	AA Air Bervice				_
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				May	1, 19 66)
TO	Mr	. Otis Minor				
		. 2 Box 68				-
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CITY_	Fa	irhope, Alabama	ZONE_	ST/	ATE	_
TERM	S				_ = ===	
Mar		Balance Due			358,	68
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FROM	AA	A Air Service				
	Rt	2 Box 77-A, Fairhop	00			
		<u> </u>	Apri	1 1,	19 66	
TO	Mr.	Otis Minor				
		2 Box 68				
		airhope, Ala. ZONE				
		21.110//03		-	44	
+		Previous Balance			312	.62
Mar	26	paid on account			- 25	,00
9 T A T	28	5.3 hrs Solo, less	as &			
		Discount (\$90.	10)		71	.06
		Balance Due			358	.68
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FRO	M	AAA Air Service	
, <u> </u>		Rt. 2 Box 77-A, Fairhope	
		March 1, 19 66	
TO_	MX	. Otis Minor	
STRE	ET_Rt	. 2 Box 68	
CITY	Fa	irhope, Ala. ZONESTATE	
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Dec.		Balance Due 312.62	2
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FROM_	A	AA Air Service					
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		Otis Minor					A
STREET	Rt	. 2 Box 68					
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B & P NO. 10	0517						

	Rt	. 2 Box 77-A, Fairh		10 //
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TO	Mx	. Otis Minor		
STREE	T pm	2 Box 68		
		irhope, Alabama ZO	NESTA	ΤΕ
		LI-110 DO 3 AND CONTROL		
TERM	S			T
		Previous Balance		165.88
Dec	19	50 min Solo		10.00
2000		1:05 Solo		12.50
		55 min Solo		10.80
	1	.9 5010		10.80
J. Co.	5	:50 min Dual		13.3
	28	1:22 Solo		16.40
		lhr Dual		16.00
NEWS TO SERVICE STREET				16.90
	1000	1:25 Solo		20.40
		1.7 Solo		6.0
		30 min Solo		13.6
	31	1:01 Solo		200
I.	100			272 6
		Balance Due		312.6

FROM	1	AAA Air Service			_
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		De	cember	1,1965	
TO	M	r. Otis Minor	11		_
STREE	T_R	t. 2 Box 68		6	
CITY	F	airhope, Ala. ZONE_	STA	TE	_
		Previous Balance		132	68
Nov.	2	1.1 Solo		13	
	8	paid on account		≈ 10	.00
	8	2.5 hrs. Solo		30	00
The state of the s		Balance Due		165	88
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FROM_		AAA Air Service Rt. 2 Box 77-A Fair	ho	00		
			No	vemb	er]	19 65
TO	Mr.	Otis Minor				
STREET	Rt.	2 Box 68 rhope, Ala. ZONE			STATE_	
TERMS		The state of the s	T			00 1.0
		Previous Balance	-			93.48
Oct	11	1 hr Dual	-			16.00
	18	paid on account	-			-20.00
	18	1.1 Solo	-		1	13.20
	27	2.5 Solo	-			30.00
		Balance Du	e			132.68

B & P NO. 10517