

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. W. Kinsey 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 the same, then and there to answer the complaint of Kaiser Agricultural Chemicals, Division of Kaiser Aluminum & Chemical Sales, Inc.

WITNESS my hand this 27 day of June, 1969.

Alice J. Duck
Clerk

Defendant resides at Foley, Alabama, and is employed by Griffin Pure Oil.

* * * * *

KAISER AGRICULTURAL CHEMICALS,)
Division of Kaiser Aluminum &)
Chemical Sales, Inc., a corporation,)
Plaintiff,)
VS.)
J. W. KINSEY,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
8776

C O M P L A I N T
COUNT ONE

The plaintiff claims of the defendant Six Hundred Twelve and 52/100 Dollars (\$612.52) due from him on account stated between the plaintiff and defendant on the 20th day of May, 1966, which sum of money, with the interest thereon, is still unpaid.

[Signature]
Attorney for Plaintiff

FILED

JUN 27 1969

ALICE J. DUCK CLERK REGISTER

ef
7-11-69

Received 27 day of June 1969
and on 17 day of July 1969
I served a copy of the within AKC
on J.W. Kinsey
By service on _____

Sheriff claims 72 miles of
Ten Cents 720
TAYLOR WILKINS, Sheriff
BY Chilress
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

By Taylor Wilkins

72

8776

Kaiser Agricultural
Chemicals

Plt

vs.
J.W. Kinsey

FILED

JUN 27 1969

ALICE J. DUCK

CLERK
REGISTER

J.R. Hever

KAISER AGRICULTURAL CHEMICALS, X
 Division of Kaiser Aluminum & X
 Chemical Sales, Inc., a X
 corporation, X
 Plaintiff, X
 vs. X
 J. W. KINSEY, X
 Defendant. X

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA

AT LAW NO: 8776

PLEA

Comes now the Defendant in the above styled cause, by and through his attorneys of record, and for answer to the Complaint heretofore filed against him, separately and severally, says as follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

By: John E. Chason
 Attorneys for Defendant

The Defendant respectfully demands a trial by a jury.

CHASON, STONE & CHASON

FILED

JUL 25 1969

By: John E. Chason
 Attorneys for Defendant

ALLIE J. DUCK CLERK REGISTER

VOL 62 PAGE 830
 I certify that we this day served J.R. Owen with a copy of this pleading.
 7/25/69. John E. Chason