

MERCHANTS' FERTILIZER AND
PHOSPHATE COMPANY OF PENSACOLA
A FLORIDA CORPORATION,

PLAINTIFF

VS

MIKE KAISER & SONS, A PARTNERSHIP

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1612

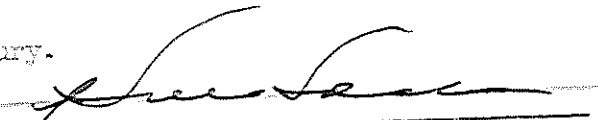
Now comes the Defendants and demur to the Plaintiff Bill of Complaint,
and to each count thereof, separately and severally says:

1.

That said count does not state a cause of action.


Attorney for the Defendants

The Defendants demand a trial by jury.


Attorney for the Defendants

RECORDED

FILED

MAR 10 1951

ALICE L. DUCK, Clerk

JURY LIST

NAME

OCCUPATION

ADDRESSES

1. Charles Heidelberg <i>Feb</i>	farmer	Silverhill	Same
2. John W. Morris	Merchant	Gateswood	Same
3. Vernon McBride <i>Wk</i>	Mechanic	Foley	Same
4. Edward E. Craft	Fleet	Stockton	
5. Steve Stejskal <i>Pr</i>	Merchant	Fairhope	Same
6. E. L. Soaps <i>re</i>	Mechanic	Foley	Same
7. L. H. Harris	Farmer	Fairhope	Same
8. Charles Fletcher	Fleet worker	Bay Minette	
9. Frank King <i>2 4</i>	Farmer	Robertsdale	Same
10. Charles Coglian	Logging	Latham	
11. Thomas L. Allen	Farmer	Gateswood	Same
12. Albert Martin <i>8</i>	Printing	Bay Minette	Same
13. William Tempian <i>5</i>	Electrician	Foley	Same
14. Aubrey C. Allen <i>5</i>	Seafood Dealer	Bon Secour	Same
15. Jewel Smith <i>5</i>	Logging	Latham	Same
16. Charlie Ellison <i>5</i>	Farmer	Rosinton	Same
17. D. H. Patterson <i>18 1</i>	Merchant	Bon Secour	Foley
18. Mitchell White	Clerk	Bay Minette	Same
19. Willie Lee Hodges <i>12 7</i>	New Port	Bay Minette	Same
20. Earl Paul <i>5 1</i>	Sea Food Dealer	Rabon Rt.	Bay Minette
21. Brad Neimier <i>5</i>	Merchant	Fairhope	Same
22. W. D. Hobbs	Farmer	Rosinton	Same
23. John Dean <i>5 2</i>	Truck Driver	Stapleton	Same
24. Preston Long	Farmer	Bon Secour	
25. Roy Teel	Farmer	Rosinton	Same
26. Robert H. Broadlove <i>5 1</i>	Cook	Foley	
27. Dan Bishop <i>5 2</i>	Farmer	Fairhope	
28. Lucie Barnard	Clerk	Mag. Springs	
29. Phillip W. Mason <i>5 3</i>	Business Mgr. Co. Schools	Bay Minette	Same
30. H. L. Lunsford	Farmer	Foley	Same
31. Kenneth Johnson <i>5 3</i>	Laundry	Fairhope	Same
32. Howard Rhodes	Farmer	Summerdale	Same

D. XXXXX XXXX

P. XXXXX XXXX

31

12

49

9

NAME	OCCUPATION	ADDRESS
1. Charles K. Heston	Farmer	1111 Hill
2. John E. Morris	Merchant	1111 Hill
3. Thomas H. Heston	Mechanic	1111 Hill
4. Edward E. Heston	Farmer	1111 Hill
5. Charles K. Heston	Farmer	1111 Hill
6. Charles K. Heston	Farmer	1111 Hill
7. J. H. Morris	Farmer	1111 Hill
8. Charles K. Heston	Farmer	1111 Hill
9. Charles K. Heston	Farmer	1111 Hill
10. Charles K. Heston	Farmer	1111 Hill
11. Thomas L. Allen	Farmer	1111 Hill
12. Charles K. Heston	Farmer	1111 Hill
13. Charles K. Heston	Farmer	1111 Hill
14. Charles K. Heston	Farmer	1111 Hill
15. Charles K. Heston	Farmer	1111 Hill
16. Charles K. Heston	Farmer	1111 Hill
17. Charles K. Heston	Farmer	1111 Hill
18. Mitchell White	Clerk	1111 Hill
19. Charles K. Heston	Farmer	1111 Hill
20. Charles K. Heston	Farmer	1111 Hill
21. Charles K. Heston	Farmer	1111 Hill
22. W. D. Hobbs	Farmer	1111 Hill
23. John Jones	Farmer	1111 Hill
24. Preston Long	Farmer	1111 Hill
25. Ray Paul	Farmer	1111 Hill
26. Charles K. Heston	Farmer	1111 Hill
27. Charles K. Heston	Farmer	1111 Hill
28. Charles K. Heston	Farmer	1111 Hill
29. Charles K. Heston	Farmer	1111 Hill
30. Charles K. Heston	Farmer	1111 Hill
31. Charles K. Heston	Farmer	1111 Hill
32. Charles K. Heston	Farmer	1111 Hill

1111 Hill
1111 Hill

16/2

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MIKE KAISER AND SONS, a Partnership, composed of Mike Kaiser, Sr., Mike Kaiser, Jr., and John Kaiser; MIKE KAISER, SR., MIKE KAISER, JR., and JOHN KAISER 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 MERCHANTS FERTILIZER & PHOSPHATE COMPANY OF PENSACOLA, a Florida Corporation.

WITNESS my hand on this 8th day of February, 1951.

Wm. J. Smith
Clerk of the Circuit Court of Baldwin
County, Alabama.

Please serve one copy of this Summons and Complaint on Mike Kaiser, Sr., Mike Kaiser, Jr., or John Kaiser, as a member of the firm of Mike Kaiser and Sons, a Partnership, composed of Mike Kaiser, Sr., Mike Kaiser, Jr., and John Kaiser.

Also, please serve one copy of this Summons and Complaint on Mike Kaiser, Sr., one copy on Mike Kaiser, Jr., and one copy on John Kaiser.

All of the above parties reside near Elberta, Alabama.

COMPLAINT

MERCHANTS FERTILIZER & PHOSPHATE
COMPANY OF PENSACOLA, a Florida
Corporation,

Plaintiff,

VS.

MIKE KAISER AND SONS, a Partner-
ship, composed of Mike Kaiser, Sr.,
Mike Kaiser, Jr., and John Kaiser;
MIKE KAISER, SR., MIKE KAISER, JR.,
and JOHN KAISER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

1. The Plaintiff claims of the Defendants Nineteen Thou-
sand, Seven Hundred Six and 94/100 Dollars (\$19,706.94) due from
them by account on the 1st day of January, 1951, which sum of money
with the interest thereon is still unpaid.

2. The Plaintiff claims of the Defendants Nineteen Thou-
sand, Seven Hundred Six and 94/100 Dollars (\$19,706.94) due from
them for merchandise, goods and chattels sold by the Plaintiff to
the Defendants on the dates shown by the invoices hereto attached,
to which reference is hereby made as though the same were fully
incorporated herein, which sum of money with the interest thereon
is still unpaid.

3. The Plaintiff claims of the Defendants Nineteen Thou-
sand, Seven Hundred Six and 94/100 Dollars (\$19,706.94) due from
them for merchandise, goods and chattels sold by the Plaintiff to
the Defendants at various times between June 6, 1949 and December
18, 1950, as will appear from the invoices, copies of which are
hereto attached, reference to which is hereby made as though fully
incorporated herein, which sum of money with the interest thereon
is still unpaid.

4. The Plaintiff claims of the Defendants Nineteen Thous-
and, Seven Hundred Six and 94/100 Dollars (\$19,706.94) due from
them by account stated between the Defendants and the Plaintiff on,
to-wit, the 10th day of January, 1951, which sum of money with the
interest thereon is still unpaid.

J. B. Blackburn
Attorney for Plaintiff.

An itemized statement of the account on which this suit is brought, verified by affidavit of a competent witness, is hereto attached.

J. B. Blackburn, Attorney for Plaintiff

The Plaintiff in this case being a non-resident corporation, I hereby acknowledge myself security for the costs of this proceeding.

J. B. Blackburn

Attorney for Plaintiff.

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Manufacturers of
MERCUR BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"**

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date _____

1945

In Account with

At

County

Deliver to.

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 8/5 19 49

No. 120596

In Account with Mike Kavan & Sons

At San Francisco County.

Deliver to_

Via _____

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 10653

No 120687

Date 8/18 1949

In Account with Mr. R. R. Ransom

At Chickadee

County.

Deliver to John K. ...

Via 1000 2nd Ave

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

No. 120706

M.P.CO. 106535

County

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

M. P. CO. 10653

Via

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 10/2 1940

Via.

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.CO. 106535

Via

1. Initial of John
 2. not so
 3. of John

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton	Amount	Total
100-lb	200-lb							
200		B	"MERCO" Premium Potatoes	10 -	4 10 7	40 40	404 00	
50		B	"MERCO" Premium Potatoes	2 50	4 10 7	40 40	101 00	
50		P	"MERCO" White Golden	2 50	16 0 6	54 85	137 12	net
			"MERCO"				242 12	
			White Golden		4 10 7	25 00	617 12	
			Plus 200-lb 2 nd entry			15 00	627 12	
			To CORRECT above Price Millions				627 00	

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 1-16 19 42

M.P.CO. 106535

Via.

Terms:

[illegible]

INVOICE

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
 and "GARDENGRO"

Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 11/17 1949

NS 121564

In Account with

At

County

Deliver to

Via

Terms:

*Has 120 gals
 from Bags*

No. of Bags		TYPE BAGS	BRANDS	TONS		Analysis			Price Per Ton		Amount		Total
100-lb	200-lb												
<i>120</i>		<i>B</i>	"MERCO" <i>Premium White Super</i>	<i>6.00</i>		<i>46</i>	<i>10</i>	<i>7</i>	<i>40</i>	<i>00</i>	<i>242</i>	<i>40</i>	
			"MERCO" <i>Super</i>	<i>2.00</i>							<i>12</i>	<i>00</i>	
			"MERCO"										
			"MERCO"										
			<i>Michael Stivers</i>										

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 11/17 1945

M.F.CO. 10633

In Account with.

At

County

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 11/21 1940

M.P.CO. 106535

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 11/22 1945

49 121592

M.P.CO. 106539

In Account with

At

County

Deliver to.

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 1/23 1949

M.P.CO. 10553

Via

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis			Price Per Ton		Amount		Total	
100-lbs	200-lbs												
<i>120</i>		<i>B</i>	"MERCO" <i>Premium Potat tubers</i>	<i>6 -</i>	<i>4</i>	<i>15</i>	<i>7</i>	<i>40</i>	<i>40</i>	<i>242</i>	<i>40</i>		
			"MERCO"	<i>Lvs</i>	<i>2</i>	<i>st</i>				<i>12.00</i>			
			"MERCO"										
			"MERCO"										
			<i>Newbert Flaxseed</i>										
												<i>230</i>	<i>40</i>

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 10/25 1940

In Account with.

At_

County

Deliver to...

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 11/22 1949

M.P.CO. 106535

In Account with

At

County

Deliver to _____

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 4/2/2019 19 4/2

M.P.CO. 106535

NO. 12142

In Account with

At

County.

Deliver to:

Via

Terms:

[illegible]

INVOICE
Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
 and "GARDENGRO"
 Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 12/8 1947

M.P.CO. 106525

12-121153
 In Account with *John Kaiser & Sons*
 At *Orlando, Fla.* County _____
 Deliver to *John Kaiser*
 Via *Truck*

Terms:

Via												
No. of Bags		TYPE BAGS	BRANDS	TONS		Analysis		Price Per Ton	Amount		Total	
100-lb	200-lb											
120			"MERCO" <i>Phosphate Rock</i>	1	-	410.7		40.00	20.00			
			"MERCO" <i>Phosphate Rock</i>	2	1/2	410.7		40.00	20.00			
			"MERCO"									
			"MERCO"									
			<i>John Kaiser</i>									

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 29 1949

M.P.CO. 106535

Terms:

County

Via 24th Street

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Manufacturers of
MER-O-BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"**

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 1/13 1950

M.P.CO. 106535

Admission

In Account with

At

County

Deliver to

Via

Terms:

7-13-62

London

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 120 192

M.P.CO. 105535

In Account with

At_

County

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 10653

Date 4/4 196

In Account with

At

County.

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERO BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 1/21 1950

M.P.CO. 10653

11-12-11

In Account with

At

County _____

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 12 1966

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Manufacturers of
MERO BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"**

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 10553

Date 11-25 1990

In Account with

At.

County _____

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 1/25 1955

AD 12276

In Account with.

At

County

Deliver to:

Via

Terms:

M.P.CO. 106539

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 10/10/1960

M.P.CO. 106535

In Account with

At

County.

Deliver to _____

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 105539

Date 11/24 1960

[illegible]

In Account with.

At

County.

Deliver to:

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 10653

Date 12/1 1964

10-122306

In Account with

At

County

Deliver to

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 11/30 1960

M.P.CO. 106535

In Account with

At

County

Deliver to.

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 2/8 1950

M. P. CO. 19653

No. 122855

In Account with Mike Howard Jones

At Elberta Ala County

Deliver to

Via

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 106535

Date 2-11 1960

16-00000

In Account with

At

County.

Deliver to _____

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 2-13 1950

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

M.P.CO. 106535

Via

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Manufacturers of
MERO BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"
Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 22 19

Figure 1

In Account with

At _____ County:

Deliver to_

Via

Terms:

M. P. CO. 106536

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 106539

Date 2-22 19 67

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 2-28 1930

M.P.CO. 196539

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

12537

M.P.CO. 106535

Via.

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.CO. 106335

Date 12/2 1941

In Account with

At

County.

Deliver to.

Via.

Terms :

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.CO. 106531

110 123593

Date _____

19

In Account with

At

County.

Deliver to.

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 5/11 1997

M.P.CO. 10653

At

County

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.C.O. 106535

Date 5/10 1970

At.

County

Via.

[illegible]

INVOICE

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"
Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 3/20 1950

M.P.CO. 105535

In Account with

At

County

Deliver to

Via

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton	Amount	Total
100-lb	200-lb							
200		5	"MERCO" <i>Reddy</i>	10 -	684	3890	38900	
			"MERCO"					
			"MERCO"	<i>2 1/2</i>			2500	
			"MERCO"					
			<i>Holston</i>					36400

INVOICE

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
and "GARDENGRO"

Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 3/28 1950

N^o 124810

In Account with Mike Kaine Jr

At Chilton, Ala County _____

Deliver to _____

Via _____

Terms: _____

M.P.CO. 106525

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton	Amount	Total
100-lb	200-lb							
<u>160</u>		<u>B</u>	"MERCO" <u>Super type</u>	<u>8 - 6</u>	<u>84</u>	<u>3890</u>	<u>31120</u>	
			"MERCO"					
			"MERCO"		<u>See 3rd</u>		<u>2000</u>	
			"MERCO"					
			<u>Mike Kaine Jr</u>					<u>29120</u>

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

M.P.-CO. 106535

County

In Account with

Deliver to

Via

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M. P. CO. 406535

Date 5-30 1960

Via

Terms:

[illegible]

INVOICE
Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
 and "GARDENGRO"

Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 4/5 19 50

Nº 125226

In Account with Mike Kaise, Hwy
 At Chattahoochee County _____
 Deliver to _____
 Via _____

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton	Amount	Total	
100-lb	200-lb								
<i>140</i>		<i>B</i>	"MERCO" <i>Red top</i>	<i>7-684</i>		<i>3890</i>	<i>27230</i>		
			"MERCO"						
			"MERCO"	<i>See out</i>			<i>1750</i>		
			"MERCO"						
			<i>Habit Shave</i>					<i>20480</i>	

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.CO. 106531

Date 2/20 1968

In Account with.

At

County.

Deliver to.

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 106535

Date 7/20 1970

County

Via.

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M. P. CO. 19653

Date 4/24 1950

110 126098

In Account with

At

County

Deliver to

Via.

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 4/24 19 57

10/21/90

In Account with.

At

County

Deliver to.

Via

Terms:

M.P.CO. 106535

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

10-12620

t with Duke Kahan & Sons

White Oak

County

Deliver to.

Via.

Terms:

M.P.CO. 106535

[illegible]

INVOICE
Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
 and "GARDENGRO"
 Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 4/29 1950

NO 126322

In Account with Mike Kaiser & Sons
 At Elberta Ala County _____
 Deliver to Same
 Via His Truck

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton	Amount	Total
100-lb	200-lb							
146		B	"MERCO" Res Sph Spec	7 30	6 8 4	38 90	283 97	
14		P	"MERCO" Res Sph Spec	70	6 8 4	37 40	26 12	
			"MERCO"				310 15	
			"MERCO"				2000	
<u>James McClain</u>								
<u>Permit # 250 per ton</u>								
<u>Err: Omit 17. This Invoice originally \$257.79 should be \$290.15</u>								
								290 15

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 106535

Date 3-6 1960

Via

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 106535

Date 11/11 1964

County

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 7/26 19 00

AD 2272

M.F.CO. 40653

In Account with Mike Kauer & Sons
At Eschata Ala County _____
Deliver to Same
Via Wes Truck

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.P.CO. 10653

Date 10/17 1950

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

M.F.C.D. 106535

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 6/20 1907

M.P.CO. 19653

In Account with

At

County

Deliver to:

Via

Terms:

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 10/21 1900

Via.

In Account with Mike Kaiser & Sons
At Edgata Ala County
Deliver to Same
Via Truck

[illegible]

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

100 129277

In Account with

Interview with Mike Kassin & Son
Eckstein, Al County

County

Deliver to.

Via _____

Terms:

[illegible]

INVOICE

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Manufacturers of
MERCO BRAND
HIGH GRADE FERTILIZER
 and "GARDENGRO"

Dealers In
ALL KINDS OF FERTILIZER
MATERIALS

Date 11-3 1950

NO 129289

In Account with

At

County

Deliver to

Via

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton		Amount		Total	
100-lb	200-lb										
50		P	"MERCO" Premium Pktn 100-lb	250	4 10 7	38 00		95 00			
			"MERCO" For Mixing 5 tons @ 4.50					9 50			
			"MERCO" 50 - 100 lb Plain Bags @ 100					5 00			
			"MERCO"					107 50			
			Is 30¢ @ 4.25 per Ton					1 25			
			Hubert Flowers								
											101 25

M.P.CO. 106335

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

Dealers In
**ALL KINDS OF FERTILIZER
MATERIALS**

Date 12/11/19

In Account with

At_

County

Deliver to _____

Via _____

Terms:

No. of Bags		TYPE BAGS	BRANDS	TONS	Analysis	Price Per Ton		Amount	Total
100-lb	200-lb								
200		B	"MERCO" Premium Peter Index	1000	4 10 7	39	95	519.50	
			"MERCO" with 15% bonus added						
			"MERCO" 1 ton — 150# @ 60 lb					9.00	
			"MERCO" Less 3rd class @ 2.5% per ton					478.50	
			Bag Premium					25.00	
								383.50	
			San Carter To Correct Price from Regular					2000	
			4-10.7 TO PREMIUM 4-10.7 NOT SPECTUM						403.50

Merchants Fertilizer & Phosphate Company of Pensacola, Inc.
PENSACOLA, FLORIDA

**Dealers In
ALL KINDS OF FERTILIZER
MATERIALS**

Date 12/18 1950

In Account with

At

County.

Deliver to

Via.

Terms:

[illegible]

January 31 19 51

IN ACCOUNT WITH

MERCHANTS FERTILIZER & PHOSPHATE CO.

POST OFFICE BOX 1306

PENSACOLA, FLORIDA

Mike Kaiser & Sons

Elberta, Alabama

M.F.CO. 99801

THROUGH INVOICE No. _____

TO INVOICES ATTACHED

\$20,110.44

TO 4035 BAGS RETURNED

403.50
\$19,706.94State of Florida,)
Escambia County.)

Before the undersigned authority this day personally came and appeared M. C. Brown, who being by me first duly sworn, on oath says he is Secretary-Treasurer of Merchants Fertilizer & Phosphate Co., of Pensacola, ~~Florida~~, a corporation organized and existing under the laws of the State of Florida; that he is familiar with the account existing between the firm of Mike Kaiser & Sons, of Elberta, Alabama, (composed of Mike Kaiser, Sr., Mike Kaiser, Jr., and John Kaiser) with said Merchants Fertilizer & Phosphate Co., a corporation, that said firm of Mike Kaiser & Sons is indebted to said Merchants Fertilizer & Phosphate Co., of Pensacola, ~~Florida~~, a corporation, in the sum of \$19,706.94 as shown by invoices hereto attached and by reference thereto made a part hereof; that said indebtedness is for fertilizers sold by said Merchants Fertilizer & Phosphate Co., of Pensacola, ~~Florida~~, to said Mike Kaiser & Sons, as shown by said invoices hereto attached and made a part hereof; that said balance of \$19,706.94 on the purchase price of said fertilizers by said Mike Kaiser & Sons from said Merchants Fertilizer & Phosphate Co., of Pensacola, ~~Florida~~, as shown by invoices therefor hereto attached, is just and correct, due, owing and unpaid, after allowing all credits to which said firm of Mike Kaiser & Sons is entitled to receive; that all of said fertilizers sold said Mike Kaiser & Sons, as shown by said invoices, were purchased by said Mike Kaiser & Sons at the place of business of Merchants Fertilizer & Phosphate Company in Escambia County, State of Florida, and delivery of all of said fertilizers as described in said invoices hereto attached and made a part hereof was actually delivered to and received and accepted by said Mike Kaiser & Sons at the place of business of Merchants Fertilizer & Phosphate Company in Escambia County, State of Florida.

Sworn to and subscribed before
me this January 31st, 1951.

M.C. Brown
Notary Public, State of Florida
at large. My commission expires
March 1, 1954.

W 1612

Received in Sheriff's Office
this 4 day of Feb. 1951
TAYLOR WILKINS, Sheriff

SUMMONS AND COMPLAINT

MERCHANTS FERTILIZER & PHOSPHATE
COMPANY OF PENSACOLA, a Florida
Corporation,

Plaintiff,

VS.

RECORDED

MIKE KAISER AND SONS, a Partner-
ship, composed of Mike Kaiser, Sr.,
Mike Kaiser, Jr., and John Kaiser;
MIKE KAISER, SR., MIKE KAISER, JR.,
and JOHN KAISER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
FEB 3 1951
ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Executed the 13th day of February, 1951 by
serving a copy of the within Summons and
Complaint on Mike Kaiser, Sr., a partnership
composed of Mike Kaiser, Sr. and Mike Kaiser,
Jr. and John Kaiser and by serving a copy
individually on Mike Kaiser, Sr., Mike Kaiser,
Jr. and John Kaiser.

Taylor Wilkins, Sheriff

BY: H. F. Hall D.S.