

CECIL G. CHASON

Attorney at Law

CHARLES H. SIMS III
ASSOCIATE

November 26, 1969

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

Mrs. Alice J. Duck
Circuit Clerk
Baldwin County
Bay Minette, Alabama 36507

9019

RE: Gulf Flying Service, Inc.
Vs. A. V. Campbell, Sr.

Dear Mrs. Duck:

Enclosed please find original and 1 copy of a
verified bill of complaint in the above referenced
case. Please file and prefect service.

Yours very truly,



Charles H. Sims, III

CHS, III:ec
enc:

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon A. V. CAMPBELL, SR. 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 GULF FLYING SERVICE, INC.

WITNESS my hand this the 1st day of ~~November~~ ^{December}, 1969.

Alice J. Duck
Clerk

GULF FLYING SERVICE, INC., an Alabama Corporation,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS)	AT LAW
A. V. CAMPBELL, SR.,)	9019
Defendant.)	

The Plaintiff claims of the Defendant ONE THOUSAND TWO HUNDRED DOLLARS (\$1,200.00) due from him by account on, to-wit: the 31st day of October, 1968, which sum of money with interest thereon is still unpaid.

An itemized statement of account, verified by affidavit is attached hereto pursuant to Section 378 of Title 7 of the Code of Alabama 1940, Recompiled 1958.

Charles H. Smith
Attorney for Plaintiff

Defendant may be served at Robertsdale, Alabama.

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, Edmond R. Ludworth the undersigned Notary Public in and for said County and said State, personally appeared SAMUEL M. STYRON, who after being by me first duly and legally sworn, deposes and says under oath as follows: That his name is Samuel M. Styron; that he is the president of GULF FLYING SERVICE, INC.; that as such president, he is familiar with the books and records of said corporation; that he has personal knowledge of the correctness of the account of A. V. Campbell, Sr., and that as of October 31, 1968, A. V. Campbell, Sr. owed on account \$1,200.00 to Gulf Flying Service, Inc., and that A. V. Campbell, Sr. has made no payments or credits on this account since that date.

Samuel M. Styron (SEAL)
Samuel M. Styron

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, Edmond R. Ludworth, the undersigned Notary Public, in and for said State and County, personally appeared SAMUEL M. STYRON, who after being by me first duly and legally sworn, deposes and says under oath that he has read the above affidavit and that the matters, facts and statements contained therein are true and correct.

Samuel M. Styron (SEAL)
Samuel M. Styron

Sworn to and subscribed before me
on this the 26th day of November, 1969.

Edmond R. Ludworth
Notary Public, Baldwin County
State of Alabama

My commission expires: 9/27/73

FILED

DEC 1 1969

ALICE J. DUCK CLERK
REGISTER

S T A T E M E N T

Gulf Flying Service, Inc.
Foley, Alabama 36535

ACCOUNT OF: A. V. Campbell, Sr.
Robertsdale, Alabama

Number	Date	Description	Charge	Pymt.	Current Balance
#911	8/30/68	200 acres soybeans	\$500.00		\$ 500.00
#1011	9/22/68	280 acres soybeans	\$700.00		\$1200.00

Received 1st Dec. 1969
on A. V. Campbell Jr.

Sheriff claims 52 miles at
Ten Cents per mile Total \$ 5.20
TAYLOR WILKINS, Sheriff
BY Brown
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff
By A. V. Campbell Jr.
52 miles R.T.
Rosinton.

9019 Rosinton

Gulf Flying Service
Inc. an Ala. Corp
Pltz.

vs.
A. V. Campbell, Jr.

FILED
DEC 1 1969
ALICE J. DUCK CLERK
REGISTER

C. G. Chason