

CECIL G. CHASON

Attorney at Law

THOMAS W. UNDERWOOD, JR.
ASSOCIATE

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

November 4, 1970

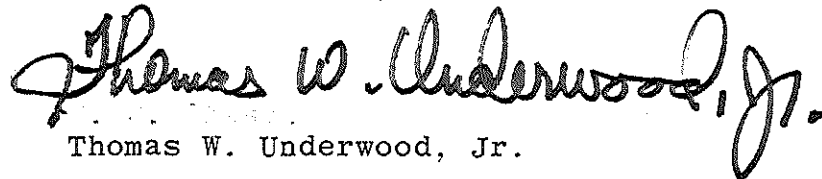
Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Re: Gulf Flying Service, Inc. 9541
vs. Douglas Rhodes

Dear Mrs. Duck:

Enclosed is Summons and Complaint in the above
styled cause. Please deliver to the Sheriff for
service.

Yours very truly,


Thomas W. Underwood, Jr.

TWU, JR/jc

OFFICE
ROUTE 1
U. S. 98-W

STATEMENT
GULF FLYING SERVICE, INC. MOBILE-UNIT 943-8045
FOLEY, ALA. 36535
OFFICE 943-5525
HOME 943-5547

OFFICE
ROUTE 1
U. S. 98-W

STATEMENT
GULF FLYING SERVICE, INC. MOBILE-UNIT 943-8045
FOLEY, ALA. 36535
OFFICE 943-5525
HOME 943-5547

Douglas Rhodes
At 1
Foley, Ala

Douglas Rhodes

Bal. 100.00

3093.28

NUMBER	DATE	DESCRIPTION	CHARGE	PAYMENT	CURRENT BALANCE
1617	8/22/68	4000 a. s/bean	1000.00		1,100.00
1618	8/22	25 a. a/bean	62.50		1,162.50
	8/31/68	rev charge	17.43		1,179.93
1715	9/1	fert. spreading	15.00		1,194.93
1739	9/11	433 a. s/bean	1082.50		2,277.43
	9/30	rev charge	34.16		2,311.59
	10/30	rev. charge	34.67		2,346.26
	11/31	rev. charge	35.19		2,381.45
	12/31	rev. charge	35.72		2,417.17
	1/31/69	rev. charge	36.25		2,453.42
	2/28	rev. charge	36.80		2,490.22
	3/31	rev. charge	37.35		2,527.57
1829	4/17	70 a. mung bean patato	70.00		2,597.57
1836	4/17	150 a. patato	150.00		2,747.57
1840	4/21	150 a. patato	150.00		2,897.57
1853	4/28	150 a. patato	150.00		3,047.57
	4/30	rev charge	45.71		3,093.28

PLEASE PAY LAST AMOUNT IN THIS COLUMN

THIS IS AN EXACT COPY OF YOUR ACCOUNT PREPARED ON 3M "JIFFMASTER" COPY PAPER

NUMBER	DATE	DESCRIPTION	CHARGE	PAYMENT	CURRENT BALANCE
1889	5/7	35 a. corn	87.50		3,180.78
1897	5/8	150 a. patato	150.00		3,330.78
1918	5/13	150 a. patato	150.00		3,480.78
1970	5/20	103 a. patato	103.00		3,583.78
1972	5/21	60 + 45 a. s/bean	157.50		3,741.28
2047	5/27	85 a. patato	487.75		4,229.03
	5/31	rev. charge	63.48		4,292.51
2113	6/13	120 a. corn	240.00		4,532.51
2138	6/29	55 a. corn	110.00		4,642.51
2190	6/30	rev. charge	69.68		4,712.19
	7/34	60 a. 2-4-2	180.00		4,892.19
	7/31	rev charge	73.42		4,965.61
	8/31	rev charge	74.52		5,040.13
	9/31	rev chg	75.67		5,115.80
	10/31	rev chg	76.48		5,192.28

PLEASE PAY LAST AMOUNT IN THIS COLUMN

THIS IS AN EXACT COPY OF YOUR ACCOUNT PREPARED ON 3M "JIFFMASTER" COPY PAPER

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Douglas Rhodes, a Notary Public in and for said County in said State, personally appeared Samuel M. Styron, who is known to me, and who, after being by me first duly and legally sworn, deposes and says that he is President of Gulf Flying Service, Inc., a corporation, and as such is familiar with the accounts of said corporation; that the foregoing statement of account of said firm against Douglas Rhodes is just, true and correct, and that there is now due on said account to Gulf Flying Service, Inc. the sum of \$5,194.54, plus accrued interest thereon, after deducting all just credits, off-sets or counter claims.

Sworn to and subscribed before me on this
4th day of November, 1970.

Douglas Rhodes
Notary Public, Baldwin County, Alabama

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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 DOUGLAS RHODES 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., a corporation.

WITNESS my hand this the 5 day of November, 1970.

Alice J. Duck
Clerk

COMPLAINT
GULF FLYING SERVICE, INC.,)
a corporation,)
Plaintiff,)
vs.)
DOUGLAS RHODES,)
Defendant.)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 9541

COUNT I

The Plaintiff claims of the Defendant Five Thousand, One Hundred Ninety-four and 54/100 Dollars (\$5,194.54) due from him for work and labor done for the Defendant by the Plaintiff from, to-wit: between July 1, 1969 and September 31, 1970, at the request of the Defendant, which sum of money, with the 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 of 1940 Recompiled 1958.

Thomas W. Underwood
Attorney for Plaintiff

Defendant may be served at
Foley, Alabama

FILED

NOV 5 1970

ALICE J. DUCK CLERK
REGISTER

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9541

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

GULF FLYING SERVICE, INC.,
a cororation,
Plaintiff,

-vs-

DOUGLAS RHODES,
Defendant.

SUMMONS AND COMPLAINT

FILED

NOV 5 1970

ALICE J. DUCK

CLERK
REGISTER

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
BY Taylor Wilkins, Sheriff
Deedee
DEPUTY SHERIFF

Received 5 day of Nov 1970
on 28 day of Nov 1970
I served a copy of the within 840
on Douglas Rhodes

By service on

TAYLOR WILKINS, Sheriff
Deedee Colburn

GULF FLYING SERVICE, INC.,
a corporation,

Plaintiff

vs.

DOUGLAS RHODES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9541

MOTION FOR DEFAULT JUDGMENT

Comes the Plaintiff in the above styled cause and files this its motion for default judgment against the Defendant on the grounds that more than thirty (30) days have elapsed since service of the summons and complaint upon said Defendant and that said summons was duly served according to law and that said Defendant has failed to answer, plead, or demur to the Complaint in this cause.

Thomas W. Underwood, Jr.
Attorney for Plaintiff

FILED

JAN 28 1971

Junice B. Blackmon
Clerk