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SAMUEL W. IRBY
FRANCIS A. POGGI, JR.

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AREA CODE 205

February 1, 1973

Eunice B. Blackmon
P. O. Box 239
Bay Minette, Alabama 36507

Dear Eunice:

As you know, Dan Robison is no longer practicing law in this area. Please place Irby and Poggi as attorneys of record on the following cases that were turned over to us by Dan.

Dr. D. K. Cooper -vs- J. Wade	Case No. 10,156 ✓
Farmers & Merchants Bank -vs- Clifford McLain & Louise McLain	Case No. 10,366
Donald Gaar, d/b/a/ Foley Auto Parts -vs- Jaye Truck Lines, Inc.	Case No. 10,346
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Laura Williams	Case No. 10,348
Kenneth Totsch, d/b/a/ Totsch Boat Works -vs- Donald Forsyth	Case No. 10,132 ✓
Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Ralph Dubuison	Case. No. 10,349
Baptist Hospital -vs- Fannie Mae Walden	Case No. 10,373 ✓
La Rue Flying Service, Inc. -vs- John R. Childress	Case No. 9,469 ✓

FILED

FEB 2 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

Eunice B. Blackmon
February 1, 1973
Page 2

Jerry Hance, d/b/a/ Magnolia Springs Garage -vs- Rodney Carver	Case No. 10,346
George W. Markham, Sr. and Randall Markham, d/b/a/ George Markham & Sons Signs -vs- H. Rowland Clifton	Case No. 10,458
Foley Tractor Co., Inc -vs- Paul L. Bonnell	Case No. 9,215 -
La Rue Flying Service -vs- Henry King	Case No. 9,615
Eddie Sweat -vs- John A. McDuffie	Case No. 9,455

If you have any questions concerning this matter, please do not hesitate to call.

Yours very truly,

Sam W. Libby
For the Firm

SWI/akb

FILED

FEB 2 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

LA RUE FLYING SERVICE, INC.) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.)
HENRY KING,)
Defendant.) CASE NO. 9615

ORDER

On this day came before this Court the Plaintiff, La Rue Flying Service, Inc., acting through its attorney of record, Daniel E. Robison, who on verified affidavit moved to set aside a Sheriff's Sale requested by the Plaintiff on the grounds that said Sheriff's sale was invalid from its inception as the property conveyed was not the property of the Defendant, Henry King. After considering said sworn petition, it is,

ORDERED, ADJUDGED AND DECREED, that the Sheriff's Sale on August 7, 1972, wherein certain real estate was sold to satisfy the judgment against Henry King, to-wit:

Lot 12 of Block 5, West Canal Pines, Gulf Shores, Alabama, with four room block house.

And

Lot 13 of Block 5, West Canal Pines, Gulf Shores, Alabama.

is hereby declared to be set aside and is to be null and void, and the Sheriff's Department is to contact the purchaser of said property and to refund his purchase price, and the cloud on this title is to be removed, with costs being taxed to the Plaintiff, La Rue Flying Service, Inc.

DONE on this the 30th day of August, 1972.

Telfair J. Mashburn
Telfair J. Mashburn, Circuit Judge

FILED

AUG 30 1972

EUNICE B. BLACKMON CIRCUIT CLERK

STATE OF ALABAMA)
BALDWIN COUNTY) TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY KING, ROUTE 3, FOLEY, ALABAMA, to appear within thirty days after the service of this summons in the Circuit Court to be held for said County, then and there to demur or plead to the complaint of La Rue Flying Service, Inc.

Witness my hand this 21 day of Dec. . . . 1970

Alice J. Duck
Clerk

* * * * *

LA RUE FLYING SERVICE, INC.)
AN ALABAMA CORPORATION,) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
v.) AT LAW
HENRY KING,) NO 9615
Defendant)

COMPLAINT

The Plaintiff claims of the Defendant, Henry King, Eight hundred and ninety-six and 90/100ths Dollars(\$896.90), due from the Defendant by account from the 30th day of June, 1970, which sum of money with interest thereon is still unpaid.

Daniel E. Robison
Daniel E. Robison
Plaintiff's Attorney

FILED

DEC 21 1970

ALICE J. DUCK CLERK REGISTER

TAYLOR WILKINS, Sheriff
By ~~Robert Johnson~~ D.S.

By service on _____

on _____

I served a copy of the within _____

and on _____ day of _____

Received _____ day of _____ 19 40

DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

Tan Cents per mile Total \$ _____

Sheriff claims _____ miles at _____

700,9615-

La True Feysing Service

vs.

Henry King

RECEIVED

DEC 21 1970

ALICE J. JAMES
CLERK
REGISTER

W. Robinson

* * * * *

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* * * * *

ALICE J. DUCK CLERK REGISTER

DEC 21 1970

FILED

Henry King

vs.

La Rue Flying Service

no. 9615

Sheriff claims 73 miles at
Ten Cents per mile Total \$ 7.30
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

Received 21 day of Dec. 19 70
and on 13 day of Jan 19 71
I served a copy of the within SVC
on Henry King
By service on _____
TAYLOR WILKINS, Sheriff
By [Signature] D. S.

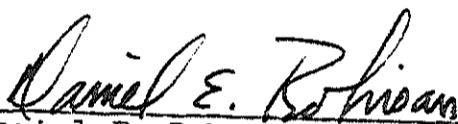
LA RUE FLYING SERVICE, INC.)	
AN ALABAMA CORPORATION,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
HENRY KING,)	NO. <u>9615</u>
Defendant)	

AMENDMENT TO COMPLAINT FILED PRIOR

Comes now the Plaintiff in the above styled cause and asks leave of this Honorable Court to amend his complaint filed heretofore, by deleting the words: "Eight hundred and ninety-six and 90/100ths Dollars(\$896.90),"

and inserting the following:

"Five hundred and ninety-six and 90/100ths Dollars(\$596.90)"


 Daniel E. Robison
 Attorney for the Plaintiff

STATE OF ALABAMA)

VERIFICATION OF ACCOUNT

BALDWIN COUNTY)

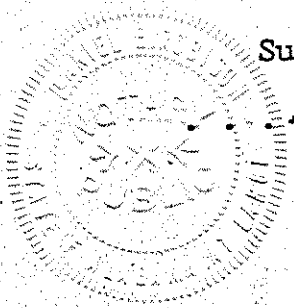
Before me, the undersigned authority on this day personally appeared DOROTHY LARUE known to me, who being by me duly sworn states on oath that the foregoing and annexed account in favor of La Rue Flying Service against Henry King for the sum of \$596⁹⁰ is within the knowledge of affiant, just and true; that it is due and unpaid and that all lawful offsets, payments and credits have been allowed.

Dorothy LaRue
Affiant

Subscribed and sworn to before me this .29. day of September 1971.

Daniel C. Robinson
Notary Public

My Commission Expires
January 28, 1975



AG CUSTOMER LEDGER

CUSTOMER King, Henry

ADDRESS Rt. 3

CREDIT LIMIT _____

LEGAL DESCRIPTION _____

Quarter of Section, _____

Township, Foley

Range, 101

County _____

JOB NUMBER	DATE 19 <u>65</u>	REMARKS	CHEMICAL USED	CROP TREATED	No. ACRES TREATED	DEBITS	CREDITS	BALANCE
	8-17	Bal. Grat. fund						71 00
8940	8-18	2.00 @ acre		beans	27	54 00		125 00
9044	8-24	2.50 " "		"	10	25 00		150 00
9522	9-14	2.00 " "		"	40	80 00		230 00
9816	10-3	2.50 " "		"	48	120 00		350 00
9875	10-15	2.00 " "		"	27	54 00		404 00
9916	10-27	2.50 " "		peas	8	20 00		424 00
10022	11-21	check					200 00	224 00
	1967							
10407	5-2	1.75 @ acre		peas	60	165 00		329 00
10738	6-6	2.50 " "		"	63	157 50		486 50
10959	7-14	check					300 00	186 50
11700	9-19	2.00 @ acre		peas	63	157 50		344 00
11899	10-13	2.75 " "		"	36	99 00		443 00
12067	12-6	3.50 " "		greens	20	70 00		513 00
	1968							
12130	1-17	check					100 00	413 00
12854	6-11	3.00 @ acre		peas	55	165 00		578 00
13229	8-6	check					100 00	478 00
13744	9-7	2.50 @ acre		beans	36	90 00		568 00
13909	9-17	2.50 " "		peas	25	62 50		630 50
13916	9-18	2.50 " "		"	25	62 50		693 00
	10-30	Transferred from King Bros.				91 00		784 00
	1969							
14425	2-7	check					100 00	684 00
14849	5-23	3.00 @ acre		peas	25	75 00		759 00
		error on ticket # 11700				31 50		790 50
15373	7-5	3.00 @ acre		peas	27	81 00		871 50
15547	8-9	check					100 00	771 50
16009	9-4	2.00 @ acre		beans	30	60 00		831 50

TOTALS

AG CUSTOMER LEDGER

CUSTOMER _____

CREDIT LIMIT _____

ADDRESS _____

DESCRIPTION _____

Quarter of Section, _____

Township, _____

Range, _____

County _____

NO. MONTH	DATE	REMARKS	CHEMICAL USED	CROP TREATED	No. ACRES TREATED	DEBITS	CREDITS	BALANCE
	1970	Bal. Brot. fund.						831.50
798	4-27	Interest for 4 mos. @ 1/2				49.92		881.42
904	5-7	2.00 @ acre		peas	72	144.00		1025.42
934	6-30	Interest for 2 mos. " "				24.96		1050.38
933	7-23	Check					200.00	850.38
979	10-25	Interest 6 mos.				46.52		896.90
	1970							-
	1-20	check					300.00	596.90
TOTALS								

FEIBELMAN & SILVER
ATTORNEYS AT LAW
2103 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA 36601

HERBERT P. FEIBELMAN, JR.
IRVING SILVER
DANIEL E. ROBISON

P. O. BOX 2082
TELEPHONE 205 433-1597
205 438-9717

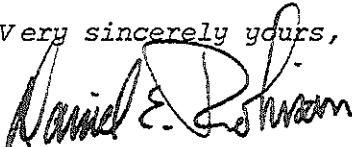
August 28, 1972

Clerk of the Court
Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Dear Eunice:

Please deliver this motion and order to Judge Mashburn.

Very sincerely yours,



Daniel E. Robison

DER/mp

Encl.

CC: Mr. Tom Byrd
Baldwin County Sheriff's Department
Bay Minette, Alabama

LA RUE FLYING SERVICE, INC.,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
HENRY KING,)	
Defendant.)	CASE NO. 9615

MOTION TO SET ASIDE SHERIFF'S SALE

Comes now the Plaintiff and files this his motion through his attorney, Daniel E. Robison, who swears and avers the following:

1. That on the 24th day of September, 1971, La Rue Flying Service obtained a default judgment against Henry King in the Circuit Court of Baldwin County, in the amount of Six Hundred Fourteen and 81/100 (\$614.18) Dollars, together with Twenty-Three and 70/100 (\$23.70) Dollars as court costs.

2. That in order to satisfy this judgment a levy of execution was sent out by the Court on certain real estate described by the Plaintiff, he believing that it was owned by the Defendant, Henry King, the description of said real estate being, to-wit:

Lot 12 of Block 5, West Canal Pines, Gulf Shores, Alabama, with four room block house.

And

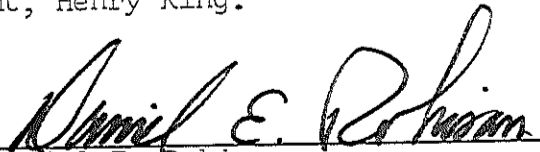
Lot 13 of Block 5, West Canal Pines, Gulf Shores, Alabama.

3. That there was confusion by the Plaintiff between property owned by Henry A. King, and Henry H. King, and that said property described was incorrect and was not owned by the Defendant in this action.

4. That on August 7, 1972, at 12:00 noon, this property was sold at Sheriff's Sale to a passer-by.

5. That the property so sold at Sheriff's Sale was not owned by the Defendant and was wrongfully sold.

WHEREFORE, the premises considered, the Plaintiff moves to set aside the Sheriff's Sale held on August 7, 1972, wherein the above described property was sold to a passer-by as this property was not, and never had been, property owned by the Defendant, Henry King.


 Daniel E. Robison

STATE OF ALABAMA)
COUNTY OF MOBILE)

Before me, the undersigned Notary Public says Daniel E. Robison after being duly sworn doth depose and say that he is the affiant for the above petition and that he has personal knowledge of the facts therein and that the same are true and correct to the best of his knowledge, information, and belief.

Daniel E. Robison
Daniel E. Robison

Sworn to and subscribed to before me
on this the 25th day of August, 1972.

Catherine B Mitchell
Notary Public

FILED

AUG 28 1972

EUNICE B. BLACKMON CLERK

FILED

AUG 29 1972

EUNICE B. BLACKMON CLERK