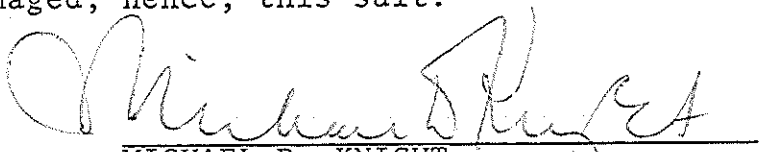


JOHN E. KONIAR, ) IN THE CIRCUIT COURT OF  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
vs. ) AT LAW  
MICHAEL A. KAISER, )  
Defendant. ) CASE NUMBER 10,187

C O M P L A I N T

Plaintiff claims of the defendant the sum of FIFTEEN HUNDRED AND NO/100 (\$1500.00) DOLLARS, as damages for that heretofore and on, to-wit, September 20, 1971, the plaintiff was operating his motor vehicle on or upon County Highway No. 32 (sometimes known as the Old Summerdale Road) at or near its intersection with County Highway No. 34 (sometimes known as the Dixie Road), both of said roads being public roads in Baldwin County, Alabama, and at said time and place, the defendant so negligently operated his motor vehicle as to cause or allow the same to collide with the plaintiff's motor vehicle. Plaintiff further avers that as a proximate result of the negligence of the defendant as aforesaid plaintiff's motor vehicle was broken, bent, smashed and damaged; hence, this suit.



MICHAEL D. KNIGHT  
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at:

Route 1, Box 112  
Elberta, Alabama

FILED

JAN 10 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

**SUMMONS AND COMPLAINT**

MOORE PRINTING CO. BAY MINETTE ALA.

**STATE OF ALABAMA**

Baldwin County

Circuit Court, Baldwin County

No. 10,187

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Michael A. Kaiser

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Michael A. Kaiser

....., Defendant.....

by John E. Koniar

....., Plaintiff.....

witness my hand this 10th day of January 19 72

*Eunice B. Blackmon* Clerk

No. 10,187

Page.....

STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

JOHN E. KDNIAK

Plaintiffs

VS.

MICHAEL A. KAISER

Defendants

SUMMONS AND COMPLAINT

Filed January 10, 1972

EUNICE B. BLACKMON Clerk

FILED

JAN 10 1972

EUNICE B. BLACKMON CIRCUIT CLERK

JAN 10 1972

JAY L. ...  
SHERIFF's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Jan 10 1972

Sheriff

I have executed this summons

this Jan 31 1972

by leaving a copy with

Michael A. Kaiser

Sheriff claims 72 miles or

ten Cents per mile Total \$ 7.20

JAY L. WILKINS, Sheriff

DEPUTY SHERIFF

Jay L. Wilkins Sheriff

Deputy Sheriff

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS E. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. McDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT  
G. HAMP UZZELLE, III

MAILING ADDRESS:  
P. O. DRAWER C  
OR P. O. BOX 123

CABLE ADDRESS:  
HAB  
TELEPHONE  
432-5511  
AREA CODE 205

January 6, 1972

Mrs. Eunice Blackmon, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

10,187

Re: John E. Koniar vs.  
Michael A. Kaiser

Dear Mrs. Blackmon:

I have enclosed herein the original and one copy  
of a complaint against the defendant, Michael A. Kaiser.  
Would you please file the same for me and acknowledge  
receipt of the complaint and the date it is filed.

Best regards.

Yours very truly,



For the Firm

MDK.er  
Enc.

FILED

JAN 10 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

JOSEPH H. LYONS (1900-1957)  
SAM W. PIPES  
WALTER M. COOK  
GORDON B. KAHN  
G. SAGE LYONS  
AUGUSTINE MEAHER, III.  
WESLEY PIPES  
NORTON W. BROOKER, JR.  
COOPER C. THURBER

AREA CODE 205  
TEL. 432-4483  
P. O. DRAWER 2727

February 27, 1972

Mrs. Eunice Blackmon  
Clerk, Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama


Re: Case Number 10,187  
John E. Koniar versus  
Michael A. Kaiser

Dear Mrs. Blackmon:

Enclosed please find pleading to be filed in the above captioned case. Please acknowledge receipt of the pleading on copy of this letter, returning the same to us in the enclosed stamped, self-addressed envelope.

Yours truly,

LYONS, PIPES & COOK



Walter M. Cook

WMC/dds  
Enclosures

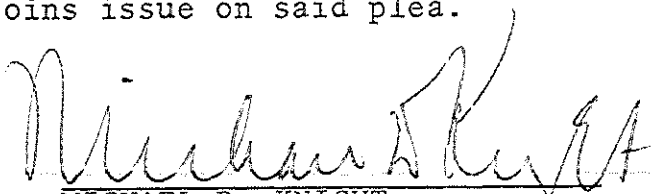


JOHN E. KONIAR, ) IN THE CIRCUIT COURT OF  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
vs. ) AT LAW  
MICHAEL A. KAISER, )  
Defendant. ) CASE NUMBER 10,187

REPLICATION

Comes now the plaintiff in the above-styled cause, John E. Koniar, and in reply to the plea of recoupment heretofore filed herein by the defendant says as follows, separately and severally:

1. Not guilty.
2. The material allegations are untrue.
3. The plaintiff joins issue on said plea.

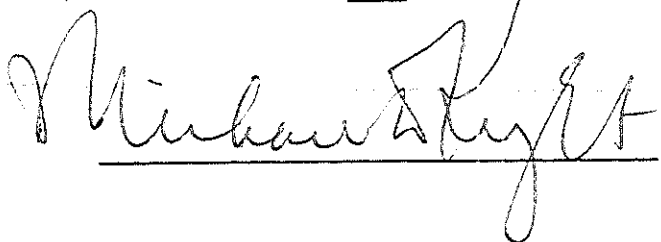
  
MICHAEL D. KNIGHT  
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing "Replication" to Walter M. Cook, Esquire, Attorney for the Defendant, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Mobile, Alabama, on this, the 12 day of May, 1972.



FILED

MAY 15 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

... ..  
... ..  
... ..  
... ..  
... ..

... ..

... ..  
... ..  
... ..  
... ..  
... ..

... ..

... ..

... ..

... ..

... ..

... ..  
... ..  
... ..  
... ..  
... ..

... ..

... ..

10.187



**LYONS, PIPES & COOK**

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES

WALTER M. COOK

GORDON B. KAHN

G. SAGE LYONS

AUGUSTINE MEAHER, III.

WESLEY PIPES

NORTON W. BROOKER, JR.

COOPER C. THURBER

AREA CODE 205

TEL. 432-4483

P. O. DRAWER 2727

June 8, 1972

Mrs. Eunice Blackmon, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: John E. Koniar, Plaintiff  
vs.  
Michael A. Kaiser, Defendant  
In the Circuit Court of Baldwin County,  
Alabama, At Law  
Case No. 10,187


Dear Mrs. Blackmon:

At such time as the Plaintiff dismisses his Complaint,  
please at the same time dismiss the Defendant's Plea of  
Recoupment, forwarding to me the bill covering the Court  
costs.

Thanking you in advance, I am

Very truly yours,

LYONS, PIPES AND COOK

  
Walter M. Cook

WMC/see

September 25, 1972

Mr. John D. Richardson, III  
Attorney at Law  
Suite 210 Van Antwerp Building  
Mobile, Alabama 36602

RE: George Long vs  
Hudson Oil Company

Dear John:

The costs in the above styled cause have not been paid.  
The amount is \$33.00, and I would very much appreciate you taking  
care of this matter immediately.

With kindest regards, I am

Very truly yours,

Taylor Wilkins, Jr.

TWJr:sp

BCC: Eunice B. Blackmon