## SUMMONS



THE STATE OF ALABAMA,

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon, SAM CHILDRESS, to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at Bay Minette, then and there to answer the complaint of LaRUE FLYING SERVICE.

Witness my hand this the 11 day of December, 1954.

Acres - renche

#### COMPLAINT

Larue FLYING SERVICE, )

PLAINTIFF )

VS:

SAM CHILDRESS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of TWO HUNDRED NINETY FOUR & 00/100 DOLLARS (\$294.00), together with interest thereon, due from him by account on, to wit: the15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

## COUNT II:

The plaintiff claims of the defendant the sum of TWO HUNDRED NINETY FOUR & 00/100 DOLLARS (\$294.00), together with interest thereon, due from him by account stated between the plaintiff and the defendant on, to wit: the 15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

#### COUNT III:

The plaintiff claims of the defendant the sum of TWO HUNDRED NINETY FOUR & 00/100 DOLLARS (\$294.00), together with interest thereon, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to wit: the 15th day of August, 1953, which sum of money, with interest thereon, is still unpaid.

There is attached to the original and made a part hereof, an itemized statement of account, sworn to by a competent witness, showing the amount due on this account as of the 20th day of December, 1954.

Attorpey for plaintiff

The defendant resides at Robertsdale, Alabama.

BERTHAL SAME AND MA

## AFFIDAVIT OF PAUL LARUE

THE STATE OF ALABAMA,
BALDWIN COUNTY.

PAUL LaRUE, first being duly sworn, deposes and says as follows:

My name is PAUL LaRUE; I am owner of LaRue Flying Service, the plaintiff

I know that on August 15, 1953, at the request of Sam Childress, I used my plane to spray 98 acres of land for him. My charges for this work were \$294.00, which is a reasonable rate; nothing has been paid on this account, and after allowing all just and due credits there still remains due and unpaid the full amount of \$294.00, together with interest.

Paul LaRue

Sworn to and subscribed before me this the 20th day of December, 1954.

12-21-54

ALICE J. WUCK, Clerk

Received 2 day of Alexand 1954, and on 5 day of Jan 1953.
I served a going of the within,

By service on

ByEdligh Steadhows.

SUMMONS AND COMPLAINT

LARUE FLYING SERVICE,

PLAINTIFF

VS:

SAM CHILDRESS,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT IAW

12-2/

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF

# FOREST A. CHRISTIAN FOLEY, ALABAMA

February 7, 1955

Hon. H. M. Hall Judge of Circuit Court Bay Minette, Alabama

Re: LaRue Flying Service

vs: Sam Childress case No. 2483

Dear Judge Hall:

Kindly render judgment in this case for \$294.00, plus \$25.00 interest, for a total of \$319.00. There is a statement and affidavit attached to the original suit.

Yours very truly,

FOREST A. CHRISTIAN