

FULTON BAG & COTTON MILLS,
A Corporation,

PLAINTIFF

VS

JOHN KAISER, MIKE KAISER
and MIKE KAISER, JR.,
Partners in business trad-
ing under the name of
MIKE KAISER & SONS

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

2585

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendants NINE HUNDRED TWENTY-FIVE DOLLARS (\$925.00) due from him by account on the 15th day of May, 1954; which sum of money with interest thereon is still unpaid.

COUNT II

The Plaintiff claims of the Defendants NINE HUNDRED TWENTY-FIVE DOLLARS (\$925.00) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendants on, to-wit, the 15th day of April, 1954; which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendants NINE HUNDRED TWENTY-FIVE DOLLARS (\$925.00) due from him on accounts stated between the Plaintiff and the Defendants on, to-wit, the 15th day of May, 1954; which sum of money with the interest thereon is still unpaid.

RICKARBY AND RICKARBY

BY: E. H. Rickarby
Attorney for the Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.

FILED

4-11-55

ALICE J. GUCK, Clerk

RICKARBY AND RICKARBY

BY: E. H. Rickarby
Attorney for the Plaintiff

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A Corporation,

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BY: E. H. Rickarby
Attorney for the Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.

FILED
4-11-55
ALICE A. DUCK, Clerk

RICKARBY AND RICKARBY

BY: E. H. Rickarby
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2585

TERM, 19--

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John Jaiser, Mike Kaiser, and Mike Kaiser, JrPartners in businessTrading under the name of MIKE KAISER & SONS

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 John Kaiser, Mike Kaiserand Mike Kaiser, Jr., Partners in business T/U/M Mike Kaiser & Sons, Defendant--by Fulton Bag & Cotton Mills, A Corp

-----, Plaintiff--

Witness my hand this 11th day of April 19 55

Clerk

No. 2585

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

FULTON BAG & COTTON MILLS, A Corp

Plaintiffs

vs.

MIKE KAISER & SONS

Defendants

Summons and Complaint

Filed 4-11-55 19__

Alice J. Duck

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

April 11 1955

Taylor Williams Sheriff

I have executed this summons

this 4/19 1955

by leaving a copy with

Mike Kaiser
Mike Kaiser Jr
John Kaiser

Taylor Williams Sheriff
Charles Chaves Deputy Sheriff

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

May 25, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Court House
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Fulton Bag and Cotton Mills
vs
Mike Kaiser and Sons
Case No. 2588
Our File: 3183

Request you have the Court enter judgment in this case for \$925.00 principal, plus \$55.50 interest, making a total of \$980.50.

Please have judgment recorded in the Probate Court, when rendered, as we have made deposit for costs.

Yours very truly,



EGR/fm
6-6-55

cc: Dun & Bradstreet, Inc.
P. O. Box 530
New Orleans1, La.

April 8, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Court House
Bay Minette, Alabama

Dear Mrs. Duck:

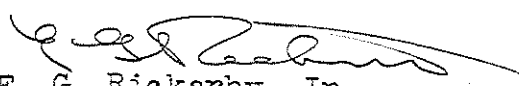
Inre: Fulton Bag and Cotton Mills
vs: Mike Kaiser and Sons
Our file: 3183

We are handing you Complaint, Itemized and
verified statement of account, deposit for
costs in the sum of \$15.00 in the matter of
Fulton Bag and Cotton Mills versus John
Kaiser, et al.

Please process and have one copy of this
complaint served on each of the partners.

Thank you.

Yours very truly,


E. G. Rickarby, Jr.

EGR/mah
Enclosures

cc: Dun & Bradstreet, Inc.
Mercantile Claims Division
P. O. Box 530, Zone 1
New Orleans, Louisiana

COUNTY OF.....

SG-188 (12742)

STATE OF.....

Be it remembered, that on this 5th day of April
A. D., 1947, personally appeared before me, the undersigned authority,
P. CHOBY IMPASTATO..... known to me
who being duly sworn, upon his oath stated that he is Office Manager
of Fulton Bag & Cotton Mills
{ a corporation organized and doing business under the laws of the State of Louisiana
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of.....
.....
a sole trader doing business as.....
and that as such he makes this affidavit; that he is familiar with the books and business of
said Fulton Bag & Cotton Mills.....; that the attached account against
MIKE KAISER & SONS..... of ELBERTA, ALABAMA
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Mike Kaiser & Sons
at { its
 their
 his } special instance and request, that credit has been duly given for all payments and
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of NINE HUNDRED TWENTY-FIVE AND NO/100..... Dollars
(\$925.00.....) with interest from May 15..... 1954..... is justly due and
remains unpaid.

P. Choby Impastato

X

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of Louisiana
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

George B Matthews

Notary Public

GEORGE B. MATTHEWS

Notary Public, Parish of Orleans, State of La.

County of..... My Commission is issued for the State of.....
My commission expires..... A. D. 19.....