

2590

SUMMONS

BOOK 003 PAGE 482

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETING:

You are hereby commanded to summon MIKE KAISER, JOHN KAISER AND MIKE KAISER, JR., doing business as 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, Alabama, at Bay Minette, against MIKE KAISER, JOHN KAISER AND MIKE KAISER, JR., doing business as MIKE KAISER & SONS, by STONE'S SUPER SERVICE.

Witness my hand this the 23 day of April, 1955.

Archie J. Lusk
Clerk

COMPLAINT

STONE'S SUPER SERVICE,

PLAINTIFF

VS:

MIKE KAISER, JOHN KAISER AND
MIKE KAISER, JR., Doing Business
as MIKE KAISER & SONS,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendants THREE HUNDRED FORTY NINE & 33/100 DOLLARS (\$349.33), due from them by account on, to wit: the 19th day of April, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The plaintiff claims of the defendants THREE HUNDRED FORTY NINE & 33/100 DOLLARS (\$349.33), due from them on account stated between the plaintiff and the defendants on, to wit: the 19th day of April, 1954, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The plaintiff claims of the defendants THREE HUNDRED FORTY NINE & 33/100 DOLLARS (\$349.33), due from them for merchandise, goods and chattels sold by the plaintiff to the defendants on, to wit: the 19th day of April, 1954, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 15th day of April, 1955.

Mike Chumley
Attorney for Plaintiff

Affidavit of Don Stone

BOOK 003 PAGE 483

THE STATE OF FLORIDA,)
)
ESCAMBIA COUNTY.)

Don STONE, first being duly sworn, deposes and says as follows:

My name is Don Stone; I am the owner of STONE'S SUPER SERVICE,
the plaintiff in this case. I am familiar with the books of the company and have
personal knowledge of the fact that Mike Kaiser & Sons, the defendants, owe Stone's
Super Service the total of \$349.33, together with interest from April 10, 1955,
after allowing all due and just credits.

Don Stone
Affiant

Sworn to and subscribed before me,
a Notary Public in and for Escambia
County, Florida, this the 15 day
of April, 1955.

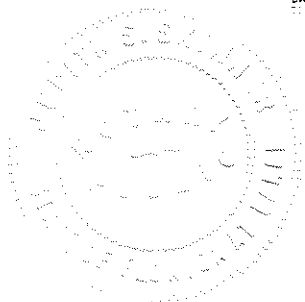
FILED

4-23 1955

ALICE J. DUCK, Clerk

Judith S. Skinner
Notary Public

My Commission Expires January 23, 1956



✓ MD 2570
RECORDED

Received 23 day of April 1955

and on 5 day of May 1955

served a copy of the within Summons

on Mike Kaiser, John Kaiser

Mike Kaiser, Jr. & Mike

by service on Heir & Sons

TAYLOR WILKINS, Sheriff

By Forest A. Christian D.S.

SUMMONS AND COMPLAINT

STONE'S SUPER SERVICE,

PLAINTIFF

VS:

MIKE KAISER, JOHN KAISER AND
MIKE KAISER, JR., Doing business
as MIKE KAISER & SONS

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

APR 23 1955

Alice J. Duck, Clerk

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

June 11, 1955

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

Re: Stones Super Service
Vs: Mike Kaiser & Sons
Case No. 2590

Dear Mrs. Duck:

Kindly take file and docket sheet to Judge Hall and have him enter judgment for \$370.33 (\$349.33 principal and \$21.00 interest), and furnish me with certificate of judgment. Kindly make the certificate of judgment against the following: Mike Kaiser, John Kaiser and Mike Kaiser, Jr., Doing Business as Mike Kaiser & Sons.

There is an itemized statement of account, sworn to by a notary public, filed with the original complaint.

Yours very truly,



FOREST A. CHRISTIAN