

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

February 8, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re; La Rue Flying Service
Vs: Frank Soesbe

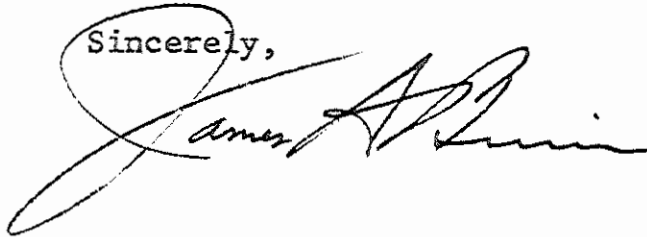
Dear Mrs. Duck:

4131

Please dismiss subject action for the plaintiff. You may send the cost bill directly to Mr. Paul La Rue, Foley, and he will mail you a check.

Thank you.

Sincerely,



CC: Mr. Paul La Rue
Foley, Alabama
(w/encl: 1. \$265.98 check
2. Statement)

C O M P L A I N T

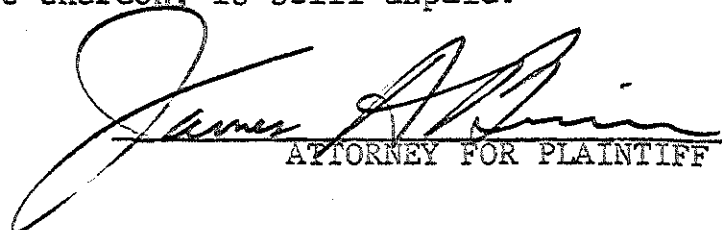
LA RUE FLYING SERVICE, INC.,) IN THE CIRCUIT COURT OF
PLAINTIFF,)
VS.) BALDWIN COUNTY, ALABAMA
FRANK SOESBE,) AT LAW.
DEFENDANT.)

I.

The plaintiff claims of the defendant the sum of Two Hundred Forty and 38/100 (\$240.38) Dollars, due from him on account, to-wit: the 1st day of November, 1959, which sum of money, with interest thereon, is still unpaid.

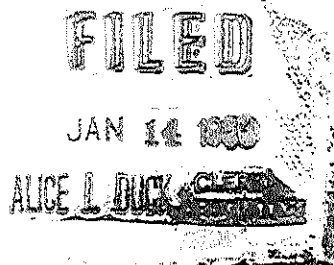
II.

The plaintiff claims of the defendant the sum of Two Hundred Forty and 38/100 (\$240.38) Dollars, due from him on account, for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 1st day of November, 1959, which sum of money, with interest thereon, is still unpaid.


ATTORNEY FOR PLAINTIFF

There is attached hereto as Exhibit A and made a part hereof, an itemized statement of account verified by affidavit of Paul La Rue, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 1st day of November, 1959.

The defendant resides at Foley, Alabama.



La Rue Flying Service, Inc.

M Frank Soeshe
faley, Ala.

PHONE: OFFICE WH 3-6168

P. O. Box 165

ACCOUNTS PAYABLE BY 10TH OF MONTH FOLLOWING DATE OF PURCHASE

BROUGHT FORWARD

				\$
5-13-57	300 # @ 24.00			72 00
5-18-57	300 # @ 16.75			50 25
5-30-57	150 # @ 11			25 13
7-16-57	check	147 00		
7-24-57	80 acs @ 2.00			160 00
7-8-58	50 " " "			100 00
5-12-59	money order	5 00		
5-23-59	"	5 00		
10-1-59	"	5 00		
11-1-59	"	5 00		
		<u>\$167 00</u>		

Bal.

\$240.38

A F F I D A V I T

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, James A. Brice, a Notary Public in and for said County in said State, personally appeared Paul La Rue, who being by me first duly sworn, deposes and says:

That he is the owner of the La Rue Flying Service, Inc; that the annexed statement of account of said La Rue Flying Service against Frank Soesbe is just, true and correct; that there is now due on said account the sum of Two Hundred Forty and 38/100 (\$240.38) Dollars, after deducting all credits, set-offs or counterclaims.


PAUL LA RUE

Sworn to and subscribed before me on
this the 11 day of January, 1960.


NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Commanded to Summon

FRANK SOESBE

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 FRANK SOESBE

-----, Defendant-----

by LA RUE FLYING SERVICE, INC.

-----, Plaintiff-----

Witness my hand this 14 day of JANUARY 1960

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W. J. Hensley, Clerk

No. 4131 Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

LA RUE FLYING SERVICE, INC.

Plaintiffs

vs.

FRANK SOESBE

Defendants

Summons and Complaint

FILED

Filed _____ 19__

JAN 14 1960

**ALICE L. DUCK, CLERK
REGISTER**

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Toley
Received In Office

1/14, 1960

Sheriff.

I have executed this summons

this Jan 25 1960
by leaving a copy with

Frank Soesbe

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY CC DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Charlie Williams

Deputy Sheriff.

Toley