

4132

C O M P L A I N T

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

I.

The plaintiff claims of the defendant the sum of Three Hundred Thirty and No/100 (\$330.00) Dollars, due from him on account, to-wit: the 20th day of August, 1957, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the defendant the sum of Three Hundred Thirty and No/100 (\$330.00) Dollars, due from him for merchandise, goods and chattels sold by the plaintiff to the defendant on, to-wit: the 20th day of August, 1957, 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 20th day of August, 1957, and due at present.

The defendant resides in Foley, Alabama.

FILED

JAN 14 1958

ALICE J. DUCK, CLERK
REGISTER

STATEMENT

SUMMERDALE, ALABAMA,

1-6

1960

La Rue Flying Service, Inc.

M. Jack Hayes
Foley, Ala.

PHONE: OFFICE WH 3-6168

P. O. Box 165

ACCOUNTS PAYABLE BY 10TH OF MONTH FOLLOWING DATE OF PURCHASE

BROUGHT FORWARD

8-20-57

165 acrs @ \$2.00

\$330.00

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 La Rue Flying Service, Inc.; that the annexed statement of account of said La Rue Flying Service against Jack Hayes is just, true and correct; that there is now due on said account the sum of Three Hundred Thirty and No/100 (\$330.00) Dollars, after deducting all credits, set-offs or counterclaims.


PAUL LA RUE

Sworn to and subscribed before me on
this the 17 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 JACK HAYES

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 JACK HAYES

-----, Defendant-----
by LA RUE FLYING SERVICE, INC.

-----, Plaintiff-----
Witness my hand this 14 day of January 1960

Ex 1-27-60

Beicy Duck, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

LA RUE FLYING SERVICE, INC.

Plaintiffs

vs.

JACK HAYES

Defendants

Summons and Complaint

FILED

Filed _____ 19__

JAN 14 1960

ALICE J. DUCK, CLERK
REGISTER

Clerk

T. A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

1/14, 1960

Sheriff.

I have executed this summons
this Jan 27 1960
by leaving a copy with

Jack Hayes

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFFTaylor Wilkins
Sheriff.
[Signature]
Deputy Sheriff.

Haley