

413

## C O M P L A I N T

LA RUE FLYING SERVICE, INC.,  
PLAINTIFF,  
VS.  
MOSS MOSELY,  
DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

I.

The Plaintiff claims of the defendant the sum of Two Hundred Eighty Three and No/100 (\$283.00) Dollars, due from him on account, to-wit: the 3rd day of September, 1954, which sum of money, with interest thereon, is still unpaid.

III.

The Plaintiff claims of the defendant the sum of Two Hundred Eighty Three and No/100 (\$283.00) Dollars, due from him for merchandise, goods and chattels sold by the Plaintiff to the defendant on, to-wit: the 3rd day of September, 1954, 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 3rd day of September, 1954, and due at present.

The Defendant resides at Foley, Alabama.

FILED  
JAN 14 1962  
ALICE L. DICK, CLERK  
REGISTER

## La Rue Flying Service, Inc.

M. Moss Moseley  
Foley, Ala.

PHONE: OFFICE WH 3-6168

P. O. Box 165

## ACCOUNTS PAYABLE BY 10TH OF MONTH FOLLOWING DATE OF PURCHASE

## BROUGHT FORWARD

5-15-54	100 H @ 4¢	4 00
9-3-54	42 1/2 acms @ 2.00	85 00
9-3-54	97 2 " @ 11	194 00
		<hr/>
		283 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 Moss Mosely is just, true and correct; that there is now due on said account the sum of Two Hundred Eighty Three and No/100 (\$283.00) Dollars, after deducting all credits, set-offs or counter-claims.

Paul La Rue  
PAUL LA RUE

Sworn to and subscribed before me on

this the 44 day of January, 1960.

James A. Brice  
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 MOSS MOSELY

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 MOSS MOSELY-----

Defendant\_---

by LA RUE FLYING SERVICE, INC.

\_\_\_\_\_, Plaintiff \_\_\_\_\_

Witness my hand this 14 day of June 1966

184

-, Clerk

No. 4132

Page \_\_\_\_\_

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

LA RUE FLYING SERVICE, INC.

Plaintiffs

vs.

MOSS MOSELY

Defendants

**Summons and Complaint**

Filed

**FILED**

19\_\_\_\_

**14 1960**

Clerk

**Alice I. Duck, CLERK REGISTER**

J. A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Moss

Received In Office

1/14, 1960

Sheriff.

I have executed this summons

this Jan 28

1960

by leaving a copy with

Moss Mosley

Sheriff claims

72 miles at

Ten Cents per mile Total \$ 7.20

Taylor Wilkins Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Charles E. Brown

Deputy Sheriff.

Moss

JAMES A. BRICE  
ATTORNEY AT LAW  
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

February 29, 1960

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

Re: ~~La Rue Flying Service, Inc.~~  
vs: Moss Mosely  
At law No. 4133

Dear Mrs. Duck:

Please place this file before Judge Hall for judgment  
by default for plaintiff and against defendant for \$283.00  
plus \$90.56 interest, a total of \$373.56.

Please send me a certificate of judgment.

Very truly yours

  
James A. Brice

JAB/vd