

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P.O. DRAWER 190
AREA CODE 205 - PHONE WH 3-2201
FOLEY, ALABAMA 36535

June 17, 1964

Honorable H. M. Hall
Circuit Judge
Bay Minette, Alabama

Re: Royster Fertilizer
Vs: Robert Pitts
Case No. 6073

Dear Judge Hall:

Kindly render judgment in this case based on an itemized sworn to statement of account in the amount of \$1400 which includes interest.

Cordially yours,


FOREST A. CHRISTIAN

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P.O. DRAWER 190
AREA CODE 205 - PHONE WH 3-2201
FOLEY, ALABAMA 36535

December 30, 1964

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

Re: Royster Fertilizer Guano Company
Vs: Robert Pitts
Case No. 6073

Dear Mrs. Duck:

This case has been settled between the parties and enclosed is my check for you to fill in, to pay the Court costs.

Cordially yours,

Forest A. Christian
FOREST A. CHRISTIAN (RAH)

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon ROBERT PITTS, 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 the place of holding same by F. S. ROYSTER Guano Company, a Virginia Corporation,

Witness my hand this the 24 day of April, 1964.

Alice J. Duck
Clerk

* * * * *

COMPLAINT

F. S. ROYSTER Guano Company,
a Virginia Corporation,

PLAINTIFF,

VS:

ROBERT PITTS,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED TWENTY-ONE & 79/100 DOLLARS (\$1,321.79), due from him by account on, to wit: 1st day of October, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED TWENTY-ONE & 79/100 DOLLARS (\$1,321.79), due from him on account stated between the Plaintiff and the Defendant on, to wit: 1st day of October, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE THOUSAND THREE HUNDRED TWENTY-ONE & 79/100 DOLLARS (\$1,321.79), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: 1st day of October, 1963, 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 20th day of April, 1964.

Defendant's Address:
Lillian, Alabama

James A. Allen
Attorney for Plaintiff

FILED

APR 24 1964

ALICE J. DUCK, CLERK
REGISTER

64-5-18-64

April 20

1964

ROBERT PITTS

LILLIAN, ALABAMA



In Account With

F. S. *Royster* GUANO COMPANY

March 20, 1963	Invoice No. 6338				
1.5 tons	Vim 6-12-12	100#P	@46.15, less \$2.00 trucking	66.23	
March 27, 1963	Invoice No. 6410				
.4 tons	Vim 6-12-12	100#P	@46.15, less \$2.00 trucking	17.66	
March 27, 1963	Invoice No. 6409				
.4 tons	Vim 0-14-14	100#P	@40.60, less \$2.00 trucking	15.44	
March 27, 1963	Invoice No. 6408				
3.4 tons	Vim 4-12-12	100#P	@42.55, less \$2.00 trucking	137.87	
April 16, 1963	Invoice No. 900				
1.00 ton	Vim 6-12-12	100#P	@46.15, less \$2.00 trucking	44.15	
April 30, 1963	Invoice No. 807				
5.76 tons	Limestone, delivered and spread	@8.50 per ton		48.96	
April 30, 1963	Invoice No. 819				
2.00 tons	Bonanza 4-12-12	100#P	@47.00, less \$2.00 trucking	90.00	
April 30, 1963	Invoice No. 820				
.50 ton	Vim 8-8-8 w/2% MgO		@46.60, less \$2.00 trucking	22.30	
May 4, 1963	Invoice No. 829				
1.00 ton	Vim 6-12-12	100#P	@46.15, less \$2.00 trucking	44.15	
May 4, 1963	Invoice No. 828				
2.00 tons	Vim 4-12-12	100#P	@42.55, less \$2.00 trucking	81.10	
May 13, 1963	Invoice No. 861				
5.04 tons	Vim 4-12-12	Bulk, delivered and spread	@46.55	234.61	
May 13, 1963	Invoice No. 865				
5.07 tons	Vim 4-12-12	Bulk, delivered and spread	@46.55	236.01	
		(continued to sheet #2)			

April 20

1964

ROBERT PITTS

LILLIAN, ALABAMA



In Account With

In Account With *F. S. Royster* GUANO COMPANY

SHEET #2

May 13, 1963	Invoice No. 866		
4.54 tons	Vim 4-12-12 Bulk, delivered and spread @46.55	211.34	
May 13, 1963	Invoice No. 867		
1.40 tons	Vim 4-12-12, w/200# zinc	59.00	
May 13, 1963	Invoice No. 872		
.75 tons	Vim 4-12-12 Bulk, delivered and spread @46.55	34.91	
July 22, 1963	Invoice No. 1040		
.05 tons	Vim 0-14-14 100#P @40.60, less \$2.00 trucking	1.93	
July 22, 1963	Invoice No. 1041		
.50 tons	Vim 4-12-12 100#P @42.55, less \$2.00 trucking	20.28	
		1 365.94	
	Less: Check 4/16 in payment of Invoice		
	No. 900 42.15		
	Less: Discount on Inv. 900 2.00	44.15	
	Net Amount Due	1 321.79	

(continued to page #3)

April 20 19 64

ROBERT PITTS

LILLIAN, ALABAMA

In Account With *F. S. Royster* GUANO COMPANY

SHEET #3

STATE OF ALABAMA

MONTGOMERY COUNTY

BEFORE ME, S. W. SWAN, a Notary Public in and for said State, personally appeared O. Evans Vaughn, known to me, who being by me first duly sworn, on oath deposes and says: that he is the Manager of the Montgomery Office of F. S. Royster Guano Company and as such has knowledge of the correctness of the foregoing account; that said statement of account is a true, accurate and complete statement of the account of the said Robert Pitts, of Lillian, Alabama, to F. S. Royster Guano Company; and, that said account is now past due and unpaid.

O. Evans Vaughn
Manager

SWORN to and subscribed before me this 20 day of April, 1964.

[Signature]
Notary Public
Montgomery County, Alabama

My Commission expires 7/7/65

6023

SUMMONS

F. S. ROYSTER Guano Company, a
Virginia Corporation,

PLAINTIFF,

VS:

ROBERT PITTS,

DEFENDANT.

May 14 1904
Robert Pitts

Wm. J. Duck
Shelby
Shelby

Sheriff claims 100 miles 31
Ten Cents per mile Total \$ 10.00
TAYLOR WILSON Sheriff
BY CC DEPUTY SHERIFF

FILED

APR 24 1904

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA