

SUMMONS

6193

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons W. J. RAYBORN, 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 THE PURE OIL COMPANY, an Ohio Corporation.

Witness my hand this the 17 day of September, 1964.

W. J. Rayborn
Clerk

* * * * *

COMPLAINT

THE PURE OIL COMPANY, an
Ohio Corporation,

PLAINTIFF,

VS:

W. J. RAYBORN,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-EIGHT & 25/100 DOLLARS (\$238.25), due from him by account on, to wit: the 1st day of October, 1964, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-EIGHT & 25/100 DOLLARS (\$238.25), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of October, 1964, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-EIGHT & 25/100 DOLLARS (\$238.25), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of October, 1964, 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 September, 1964.

W. J. Rayborn
Attorney for Plaintiff

Defendant's Address:
General Delivery
Foley, Alabama 36535

FILED

SEP 17 1964

ALICE I. DICK, CLERK
REGISTER

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

February 15, 1965

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

6193
Re: The Pure Oil Company
Vs: W. J. Rayborn
\$238.25 Plus Costs & Int.

Dear Mrs. Duck:

Since we are informed that the Debtor has moved to the State of Louisiana, please have the Judge enter a nonsuit in this case and refund the balance of Court costs.

I will see my Doctor next Friday and I may be released for work Monday, February 22, 1965.

Cordially yours,


FOREST A. CHRISTIAN

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BALDWIN COUNTY.)

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Witness my hand this the 17 day of September, 1964.

Rising
Clerk

* * * * *

COMPLAINT

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VS:

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Wm. C. C. C.
Attorney for Plaintiff

Defendant's Address:
General Delivery
Foley, Alabama 36535

N.F.

FILED
SEP 27 1964
ALICE I. DICK, CLERK
REGISTER

STATE OF OHIO }
COUNTY OF FRANKLIN } SS

T. V. Dickens being first duly sworn, says that he is Attorney
 of The Pure Oil Company, an Ohio
corporation; that there is due and owing to The Pure Oil Company
from W. J. Rayborn on an account for goods, wares and
merchandise sold and delivered, statement of account showing balance due
which is attached hereto and made a part hereof; that there are no off-sets
or counter claims, and that no part of said claim has been paid; and that to
the best of his knowledge, information and belief, there is justly due and
owing to The Pure Oil Company
from said W. J. Rayborn the sum of Two Hundred Thirty Eight and
25/100 Dollars (\$238.25).
plus interest at the rate of 6 per cent.


Affiant further states that is unable to determine whether or not the
defendant herein is in the military service of the United States.

THE PURE OIL COMPANY



Attorney

Subscribed and sworn to before me
this 15th day of September, 1964.



M. F. BELL
Notary Public, Franklin County, Ohio
My Commission Expires May 21, 1967.

M. 6193

SUMMONS

THE PURE OIL COMPANY, an Ohio
Corporation,

PLAINTIFF,

VS:

W. J. RAYBORN,

DEFENDANT.

Received 17 day of Sept 1941
Served a copy of the within summons
on W. J. Rayborn
by service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Ret. Not found.
Jm Eastland
C. Childers

Returned 28 day of Sept 1941
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By W. J. Rayborn
Deputy Sheriff

FILED

9-17 1941

W. J. COCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

STATEMENT
THE PURE OIL COMPANY

7257-950-1.

W. J. Rayborn

General Delivery

Foley, Alabama

[illegible]

STATE OF OHIO)
) SS
COUNTY OF FRANKLIN)

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THE PURE OIL COMPANY

T. V. Dickens
Attorney

Subscribed and sworn to before me
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H. F. Bell

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Notary Public, Franklin County, Ohio
My Commission Expires May 21, 1967