

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons FRED DUGGER, to appear and plead, answer or demur, within thrity 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.

Rice J. Church
Clerk

* * * * *

COMPLAINT

THE PURE OIL COMPANY, an
Ohio Corporation,

PLAINTIFF,

VS:

FRED DUGGER,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 98/100 DOLLARS (\$276.98), due from him by account on, to wit: the 31st day of July, 1962, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 98/100 DOLLARS (\$276.98), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 31st day of July, 1962, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED SEVENTY-SIX & 98/100 DOLLARS (\$276.98), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 31st day of July, 1962, 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 14th day of September, 1964.

Arthur C. Allen
Attorney for Plaintiff

DEFENDANT's ADDRESS:

Summerdale, Alabama

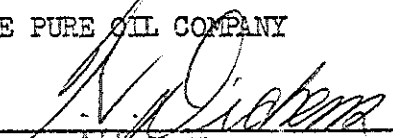
64-9-24-64

STATE OF OHIO)
) SS
COUNTY OF FRANKLIN)

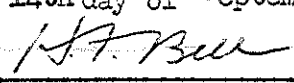
T. V. Dickens being first duly sworn, says that he is Attorney
of The Pure Oil Company, an Ohio
corporation; that there is due and owing to The Pure Oil Company
from Fred Dugger on an account for goods, wares and
merchandise sold and delivered, statement of account showing balance due
which is attached 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 Fred Dugger the sum of Two Hundred Seventy Six and
98/100 Dollars.(\$276.98)
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 14th day of September, 1964.


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

720. 6194

SUMMONS

THE PURE OIL COMPANY, an Ohio
corporation,

PLAINTIFF,

VS:

FRED DUGGER,

DEFENDANT.

Received 17 day of Sept. 6
and on 24 day of Sept. 6
served a copy of the within
on Fred Dugger

By service on _____

TAYLOR WILKINS, Sheriff
By Taylor Wilkins S.S.

Sheriff claims 60 miles at
Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

FILED

SEP 27 1904

ALICE J. DICK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

Summersdale, Ala.
Oct. 19, 1964

Mrs. Alice Duck
Bay Minette, Ala.

Dear Mrs Duck-

In regard to the debt that the pure oil Co. claims I owe them. I do not owe them such a debt as I havent bought anything on credit from them for several years. I also can prove that I paid them a few years ago all I owed them. and at that time I asked their Dealer not to deliver anything else to my place without I ordered it and in that case I would pay cash. Since this ^{order} was not requested of or by me, and if their Dealer had took me at my word, the Oil Co would have no claim against me now. So if I need further proof that I havent bought anything on credit from them for several years, let me know.

10 20 1964

145

Fred Wigger

MADE I. DUCK, CLERK, REGISTER