

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

January 22, 1965

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama

Re: The PureOil Company
Vs: Thomas Ellis
Case No 6247

Dear Judge Mashburn:

Kindly rend a judgment in this case for \$427.50 which
includes interest.

Cordially yours,

Forest A. Christian
FOREST A. CHRISTIAN (F.A.C.)

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons THOMAS ELLIS, 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 20 day of October, 1964.

Alice J. Dick

Clerk

** ** *

COMPLAINT

THE PURE OIL COMPANY, an
Ohio Corporation,

PLAINTIFF,

VS:

THOMAS ELLIS,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6247

COUNT I:

The Plaintiff claims of the Defendant THREE HUNDRED NINETY-EIGHT & 28/100 DOLLARS (\$398.28), due from him by account on, to wit: the 12th day of October, 1963, which sum of money, with interest thereon is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant THREE HUNDRED NINETY-EIGHT & 28/100 DOLLARS (\$398.28), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 12th day of October, 1963, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant THREE HUNDRED NINETY-EIGHT & 28/100 DOLLARS (\$398.28), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 12th 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 smount due on this account as of the 14th day of October, 1964.

James C. Cunn

Attorney for the Plaintiff

Defendant's Address:

Route 1#, Box 131 C
Loxley, Alabama

FILED

OCT 20 1964

350

ALICE J. DICK, CLERK
REGISTER

64-10-26-64

STATE OF OHIO

) SS

COUNTY OF FRANKLIN

W. R. Tucker, Jr. being first duly sworn, says that he is Assistant Collection
Manager of The Pure Oil Company, an Ohio

corporation; that there is due and owing to The Pure Oil Company

from Thomas Ellis

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 Thomas Ellis

the sum of Three Hundred Ninety Eight and

28/100 Dollars. (\$398.28)

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

Assistant Collection Manager

Subscribed and sworn to before me

this 14th day of October, 1964.

Edward D. Gould

EDWARD A. DAVID

MY COMMISSION EXPIRES JUNE 30, 1969

6247

SUMMONS AND COMPLAINT

THE PURE OIL COMPANY, an Ohio
corporation,

PLAINTIFF,

VS:

THOMAS ELLIS,

DEFENDANT.

received

20 Oct 64
26 Oct 64

served a copy of this within

Thomas Ellis

service on

TAYLOR WILKINS, Sheriff

By W. C. Barnes
Sgt. L. H.

County of

40

of County of

400

TAYLOR WILKINS, Sheriff

Damon
DEPUTY SHERIFF

FILED

OCT 20 1964

Alice J. Dick, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA