

SUMMONS

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons WILLIAM R. TURNER, 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 2nd day of Sept. 1965.

Alice J. Duck
Clerk

* * * * *

COMPLAINT

THE PURE OIL COMPANY, an	X	
Ohio Corporation,	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
PLAINTIFF,	X	
VS:	X	AT LAW
WILLIAM R. TURNER,	X	6673
	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTEEN & 47/100 DOLLARS (\$116.47), due from him by account on, to wit: the 24th day of November, 1964, which sum of money with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTEEN & 47/100 DOLLARS (\$116.47), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 24th day of November, 1964, which sum of money, with interest thereon, is still unpaid.

COUNT III

The Plaintiff claims of the Defendant ONE HUNDRED SIXTEEN & 47/100 DOLLARS (\$116.47), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 24th day of November, 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 20th day of August, 1965.

Mary C. Martin
Attorney for the Plaintiff

DEFENDANT'S Address:

Box 239
Robertsdale, Alabama 36567

FILED

84-11-5-65

SEP 2 1965

ALICE J. DUCK, CLERK
REGISTER

Form 118.917 P50 5-61

THE PURE OIL COMPANY

37-7782-881-5

WILLIAM R TURNER

BOX 239

ROBERTSDALE ALA

[illegible]

STATE OF OHIO

COUNTY OF FRANKLIN

SS

H. F. Bell being first duly sworn, says that he is Collection
Manager of The Pure Oil Company, an Ohio

corporation; that there is due and owing to The Pure Oil Company
from William R. Turner 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 William R. Turner the sum of One Hundred Sixteen and 47/100
(\$116.47) Dollars

plus interest at the rate of

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

Collection Manager

Subscribed and sworn to before me

this 27th day of August, 1965.

W. R. TUCKER, Jr

NOTARY PUBLIC, FRANKLIN COUNTY, OHIO
MY COMMISSION EXPIRES SEPT. 25, 1963

FILED

SEP 2 1955

1960
CLERK
REGISTER

6673

Served 2 day of Sept 1968
and 3 day of Nov 1968
copy of the within
William R. Turner

By service on
Taylor Wilkins, Sheriff
R. W. Clark

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
by Charles C. Childers
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

THE PURE OIL COMPANY, an Ohio
Corporation,

PLAINTIFF,

TO

WILLIAM R. TURNER,

304239

DEFENDANT.

FILED
SEP 3 1968
CLERK
JAMES M. BRIGHT

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

December 13, 1965

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama

Re: Pure Oil Company, a division
of Union Oil Company of Calif.
Vs: William R. Turner
Case No. 6673

Dear Judge:

Kindly render a default judgment in this case on sworn to itemized statement of account, in the amount of \$116.47 principal, \$7.00 interest, for a total of \$123.47.

Cordially yours,

A handwritten signature in dark ink, appearing to read "Forest A. Christian", is written over the typed name.

FOREST A. CHRISTIAN