

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. 6553 TERM, 1965.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon P. C. YOAS, Individually, 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, State of Alabama, at Bay Minette, against P. C. YOAS, Individually, Defendant, by THE PURE OIL COMPANY, a corporation, Plaintiff.

WITNESS my hand this 17 day of June, 1965.

Deane J. Smith Clerk.

THE PURE OIL COMPANY, a Corporation, Plaintiff,	Ø	
	Ø	IN THE CIRCUIT COURT OF
VS.	Ø	
	Ø	BALDWIN COUNTY, ALABAMA.
P. C. YOAS, Individually, Defendant.	Ø	
	Ø	AT LAW. <u>6553</u>

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant THREE HUNDRED TWENTY-ONE AND 45/100 (\$321.45) DOLLARS due from him by account on, to-wit, the 16th day of December, 1964, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.


Count II.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY-ONE AND 45/100 (\$321.45) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 16th day of December, 1964, which sum of money, with the interest thereon, is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED TWENTY-ONE AND 45/100 (\$321.45) DOLLARS due from him

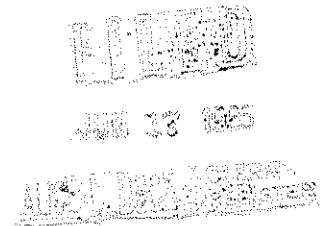
by account stated on, to-wit, the 16th day of December, 1964,
which sum of money, with the interest thereon, is still un-
paid.



E. G. RICKARBY,
Attorney for Plaintiff.

Mr. Yoas's address is 18 Cliff Drive, Fairhope, Alabama.

64-6-19-65





P. C. VOAS
18 CLIFF DRIVE
FAIRHOPE ALA.

U. S. 90
LOXLEY, ALABAMA
1-173-9818 130 8
STATEMENT DATE JAN. 31, 1965

DC

PLEASE RETURN THE DUPLICATE COPY OF THIS STATEMENT WITH YOUR REMITTANCE.

DATE	* MONTH	INVOICE NUMBER	CHARGE	CREDIT	
21 - RENT ACCOUNT					
JUN	1 64 39	8006	46.45	PARTIAL AMOUNT	5
JUL	1 64 39	8007	75.00		2
AUG	1 64 39	8008	75.00		2
SEP	1 64 39	8009	75.00		2
OCT	1 64 39	8010	75.00		2
DEC	16 64 40	R931	25.00		R
				321.45	

FOR THIS STATEMENT

PAY THIS AMOUNT

321.45

* SEE THE REVERSE SIDE FOR AN EXPLANATION OF THE PRODUCT AND TRANSACTION CODES.

WE PREPARE STATEMENTS ON A CALENDAR MONTH BASIS WHICH INCLUDES ITEMS OPEN AT THE BEGINNING OF THE MONTH AND ALL CHARGES AND CREDITS FOR THE CURRENT MONTH. 30 DAY ACCOUNTS ARE PAID ON OR BEFORE THE 15TH OF THE MONTH FOLLOWING DATE OF DELIVERY.

THIS STATEMENT IS A RECORD OF INVOICES AND PAYMENTS RECEIVED IN OUR ACCOUNTING DEPARTMENT PRIOR TO THE DATE OF THIS STATEMENT. IF NOT CORRECT, WRITE TO THE FIRM OR COMPANY CREDIT DEPARTMENT.

P. O. BOX 6136, BIRMINGHAM 1, ALABAMA

STATE OF OHIO

COUNTY OF FRANKLIN

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 P.C. Yoas

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 P. C. Yoas the sum of Three Hundred Twenty-One and

45/100 (\$321.45) 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 9th day of June, 1965.

W. R. TUCKER, JR.

NOTARY PUBLIC, FRANKLIN COUNTY, OHIO

MY COMMISSION EXPIRES ON 1-28-1950

No. 6553

The Pure Oil Co

VS

P. C. Yoaz, Inc.

THE PURE OIL COMPANY

RENTAL (935772) DOLLARS

COLLECTION SERVICE

THE PURE OIL COMPANY

RENTAL (935772) DOLLARS

RENTAL (935772) DOLLARS

JUN 11 1965

E. A. Rickaby

Red 17 day of June 1965
on 19 day of June 1965
with a copy of the
P. C. Yoaz

Service on P. C. Yoaz
Taylor Wilkins, Sheriff
By Roy Randall
St. Hope

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

TELEPHONE 926-9336

LAW OFFICES

P. O. BOX 471

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

June 15, 1965

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

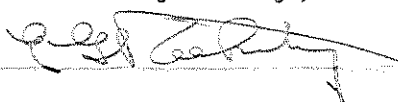
Dear Mrs. Duck:

Inre: The Pure Oil Company
Vs: P. C. Yoas
Our File: 65-122

With this we are handing you Summons & Complaint, an itemized and verified statement of account and \$25.00 deposit for costs in the above styled cause.

Please process and oblige.

Yours very truly,



EGR/jlb
Encls.
6-25-65

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

July 30, 1965

Honorable Telfair J. Mashburn
Circuit Judge
Bay Minette, Alabama

Dear Judge Mashburn:

Inre: The Pure Oil Company
Vs: P. C. Yoas
Case No. 6553
Our File: 65-122

In this case we request a judgment for costs as we filed suit on an itemized and verified statement of account. After filing suit, Mr. Yoas sent check to Griffin Motor Company as shown by copy of my letter with the endorsement of Mr. Griffin showing what was done, and am writing Mr. Yoas that I am asking for this judgment for costs.

Yours very truly,

EGR/jlb
cc: Mr. P. C. Yoas
cc: Petroleum Collection Agency
8-9-65