

3316

CASCADE PETROLEUM COMPANY,	I	IN THE CIRCUIT COURT OF
a Corporation	I	BALDWIN COUNTY, ALABAMA
PLAINTIFF	I	AT LAW
VS	I	
A. B. McDILL,	I	
Individually	I	
DEFENDANT	I	

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant ONE HUNDRED THIRTY-SIX DOLLARS AND FIFTY-FOUR CENTS (\$136.54) due from him by account on the 30th day of June, 1956; which sum of money with interest thereon is still unpaid.

E. G. RICKARBY

BY: E. G. Rickarby
Attorney for the Plaintiff

Note: The account sued on is evidenced by an itemized and verified statement filed herewith.

E. G. RICKARBY

BY: E. G. Rickarby
Attorney for the Plaintiff

VERIFICATION FOR STATEMENT OF ACCOUNT

STATE OF COLORADO

Denver COUNTY

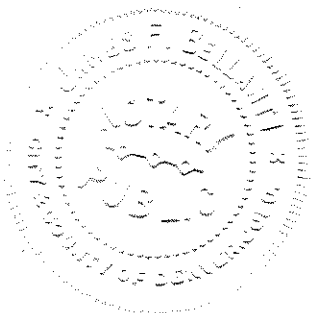
Before me, the undersigned Notary Public, personally appeared Norman Kennedy, who, being duly sworn, deposes and says that he is Asst. Vice President of CASCADE PETROLEUM COMPANY, the owner of the attached account and that the attached account is a correct statement of account between CASCADE PETROLEUM COMPANY and A. B. McDILL, BAY MINETTE, ALABAMA, and that there is owing from the said A. B. McDILL to the said CASCADE PETROLEUM COMPANY the sum of ONE HUNDRED THIRTY SIX ^{& 54/100} (\$ 136.54), with interest from June 30 1956.

Norman Kennedy
AFFIANT

Subscribed and sworn to before me on this the 16th day of August, 1957.

James F. Bellanti
Notary Public

My Commission expires December 1, 1960



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon A. B. McDILL

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 A. B. McDILL

-----, Defendant-----

by CASCADE PETROLEUM COMPANY, A Corporation

-----, Plaintiff-----

Witness my hand this

22

day of

Aug

1957

Arthur J. Hensley

-----, Clerk

LAW OFFICES
E. G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

August 20, 1957

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

Dear Mrs. Duck:

Inre: Cascade Petroleum Company
Vs: A. B. McDill
Our File: 4109

With this we are handing you summons and complaint in the above styled cause, together with itemized and verified statement of account, along with deposit for costs in the sum of \$10.00.

Please process and oblige.

Yours very truly,



ts=

cc: (dup) Allyn M. Schiffer, Inc.

Encl. Chk #A 7562 - Allyn M. Schiffer, Inc. - \$10.00
8-30-57

CASCADE PETROLEUM COMPANY,
A Corporation

PLAINTIFF

VS

A. B. McHILEY Individually,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. _____

Comes the Defendant and for answer to count one of said complaint and to each phase thereof separately and severally shows unto this Court as follows:

COUNT 1

He denies the allegations of said complaint.

A B McHiley
Defendant.

Sworn to and subscribed before me this the 25 day of September, 1957.

C. L. Davis
Notary Public, Baldwin County, Alabama.

CASCADE PETROLEUM COMPANY,
a corporation,

PLAINTIFF

VS

A. B. McDILL, Individually,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

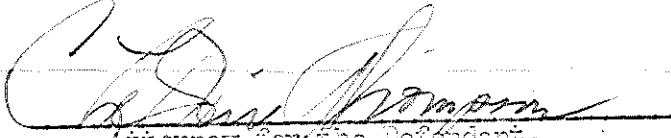
AT LAW.

CASE NO. _____


TO THE HONORABLE H. M. WALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA:

Now comes the Defendant, A. B. McDill, upon service of the original complaint in the above described cause has been made and shows unto this Court that the Plaintiff in said cause is a non-resident of the State of Alabama and security for costs has not been made by the Plaintiff.

WHEREFORE the Defendant moves that the cause be dismissed for failure to give security for cost in the mode and manner provided by the statute of the State of Alabama, thereunto related.


Attorney for the Defendant.

Complying with requirements that jury demand be made on the first pleading, Defendant, by his attorney, demands a trial by jury.


Attorney for the Defendant.