#### SUMMONS

STATE OF ALABAMA, )

BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons AUBREY LONG, 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, a division of Union Oil Company of California.

Witness my hand this the 29 day of August, 1966.

\* \* \* \*

#### COMPLAINT

THE PURE OIL COMPANY, a division of Union Oil X Company of California, Ĭ IN THE CIRCUIT COURT OF PLAINTIFF, X BALDWIN COUNTY, ALABAMA VS: X AT LAW case no. <u>7/</u>2/8 X AUBREY LONG, X DEFENDANT.

## COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED NINETY-SEVEN & 90/100 DOLLARS (\$197.90), due from him by account on, to wit: the 16th day of June, 1965, which sum of money, with interest thereon, is still unpaid.

## COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED NINETY-SEVEN & 90/100 DOLLARS (\$197.90), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 16th day of June, 1965, which sum of money, with interest thereon, is still unpaid.

## COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED NINETY-SEVEN & 90/100 DOLLARS (\$197.90), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 16th day of June, 1965, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statment 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 23rd day of August, 1966.

Defendant's address: c/o Tidewater Equipment Bay Minette, Alabama

64-8-29-66

ATTORNEY FOR THE PLAINTIFF

Forest A. Christian Foley, Alabama

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COUNTY	OF	C	0	0	K	)	

Before me, the undersigned authority, personally
appeared W. R. Tucker, Jr. , who, upon being duly
sworn, says that he isCollection Manager
of Pure Oil Company, A Division of Union Oil Company of
California, a California corporation; that there is due
and owing to Union Oil Company of California from
Aubrey Long of Bay Minett, Alabama
on an account for goods, wares and merchandise sold and
delivered (statement of account showing balance due is
attached hereto and made a part hereof); that there are
no off-sets or counterclaims to such outstanding balance;
that no part of said outstanding balance has been paid;
and that to the best of his knowledge, information and
belief, there is justly due and owing to Union Oil Company
of California as of this date from said Aubrey Long
the sum of One Hundred Ninety-seven and 90/100
Dollars (\$ 197.90 ).

Affiant further states that it is unable to determine whether or not the defendant herein is in the military service of the United States.

M. R. Much, J.

Subscribed and sworn to before me

this 23rd day of August , 19 66

Notary Public in and for County, County

My commission expires:

June 14, 1967

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# SUMMONS AND COMPLAINT

THE PURE OIL COMPANY, a division of Union Oil Company of Calif.,

PLAINTIFF,

VS:

AUBREY LONG,

DEFENDANT.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA