

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____ TERM, 1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon RICHARD R. BURROUGHS 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 RICHARD R. BURROUGHS, Defendant, by PURE OIL COMPANY, A Division of Union Oil Company of Californis, a California Corporation, Plaintiff.

WITNESS my hand this 31st day of July, 1967.
Alice J. Wilcox Clerk.

PURE OIL COMPANY, a Division of
Union Oil Company of California,
a California Corporation,

Plaintiff,

VS.

RICHARD R. BURROUGHS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

7650

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant TWO HUNDRED NINETY-FIVE AND NO/100 (\$295.00) DOLLARS due from him by account in June, 1967, 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 TWO HUNDRED NINETY-FIVE AND NO/100 (\$295.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant in June, 1967, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY-FIVE (\$295.00) DOLLARS due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant between May, 1966, and June,

Cont'd, Summons & Complaint,
Pure Oil Co., vs. Burroughs.

1967, which sum of money with the interest thereon is still due and unpaid.



E. G. RICKABY, Attorney for
Plaintiff.

Defendant resides in Daphne, Alabama.

FILED

JUL 31 1967

ALICE J. DUCK CLERK
REG. STER

STATE OF ILLINOIS)
) -ss-
COUNTY OF C O O K)

Before me, the undersigned authority, personally appeared W. R. Tucker, Jr., who, upon being duly sworn, says that he is Assistant Collection 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 Richard D. Burroughs of Daphne, 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 Richard R. Burroughs the sum of Two hundred ninety five and 00/100 Dollars (\$ 295.00).

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

W. R. Tucker, Jr.

Subscribed and sworn to before me

this 19 day of July, 1967.

[Signature]
Notary Public in and for
Kane County, Illinois

My commission expires:
MY COMMISSION EXPIRES APRIL 13, 1971

FILED

JUL 31 1967

ALICE J. DUCK CLERK
REGISTER

Daphne
Case No. 7650

Pure Oil Co.

Pety

vs.

Richard R. Burroughs
Daphne, Ala.
Dept.

Close to City Hall
on 6th Street

3rd on left
S. of City Hall

FILED

JUL 31 1967

ALICE J. DUCK

CLERK
REGISTER

E. G. Rickaby, Atty

31 day of July 1967
day of 19
a copy of the within
Richard R. Burroughs

Service on
TAYLOR WILKINS, Sheriff
By

Ret. Not found
8-5-67

Richard R. Burroughs
is in Africa for the
next 6 mo.

His wife states -

She lives 3 houses
south of the jail in
Daphne - on 6th St.

Jm Eastman
Daphne, Ala.

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____ TERM, 1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon RICHARD R. BURROUGHS 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 RICHARD R. BURROUGHS, Defendant, by PURE OIL COMPANY, A Division of Union Oil Company of Californis, a California Corporation, Plaintiff.

WITNESS my hand this 31st day of July, 1967.

Alice J. Dink Clerk.

PURE OIL COMPANY, a Division of
Union Oil Company of California,
a California Corporation,

Plaintiff,

VS.

RICHARD R. BURROUGHS,

Defendant.

Ø
Ø
Ø
Ø
Ø
Ø
Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

7650

COMPLAINT

Count I.

The Plaintiff claims of the Defendant TWO HUNDRED NINETY-FIVE AND NO/100 (\$295.00) DOLLARS due from him by account in June, 1967, 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 TWO HUNDRED NINETY-FIVE AND NO/100 (\$295.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant in June, 1967, which sum of money with the interest thereon is still unpaid.

Count III.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED NINETY-FIVE (\$295.00) DOLLARS due from him for merchandise, goods and chattles sold by the Plaintiff to the Defendant between May, 1966, and June,

Cont'd, Summons & Complaint,
Pure Oil Co., vs. Burroughs.

1967, which sum of money with the interest thereon is still due and unpaid.


E. G. RICKABY, Attorney for
Plaintiff.

Defendant resides in Daphne, Alabama.

FILED

JUL 31 1967

ALICE J. DUCK CLERK
REGISTER

STATE OF ILLINOIS)
) -ss-
COUNTY OF C O O K)

Before me, the undersigned authority, personally appeared W. R. Tucker, Jr., who, upon being duly sworn, says that he is Assistant Collection 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 Richard D. Burroughs of Daupine, 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 Richard D. Burroughs the sum of Two hundred ninety five and 00/100 Dollars (\$ 295.00).

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

J. R. Tucker, Jr.

Subscribed and sworn to before me

this 18 day of July, 1967.

Notary Public in and for
Kane County, Illinois

My commission expires:

MY COMMISSION EXPIRES APRIL 13, 1971

FILED

JUL 31 1967

ALICE J. DUCK CLERK
REGISTER

CODE 205
Telephone: 923-9536

LAW OFFICES

Mailing Address
P.O. BOX 471

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

July 24, 1967

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

7650

Dear Mrs. Duck:

Inre: Pure Oil Co.
Vs: Richard R. Burroughs
File: 67-108

Enclosed find Summons & Complaint in the above-styled cause,
together with itemized and verified statement of account and
check for \$25.00 Court costs.

Please process and oblige and have Sheriff advise when the
debtor has been served.

Thanks.

Yours very truly,



EGR/jlb
Encls.
8-4-67
cc: Client