

CODE 205  
Telephone: 928-9836

LAW OFFICES

Mailing Address  
P.O. BOX 471

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

July 31, 1967

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

7655

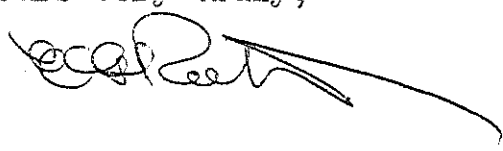
Dear Mrs. Duck:

Inre: Continental Oil Company  
Vs: Jerome F. Klien  
File: 67-219

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 debtor  
has been served.

Yours very truly,



jlb  
Encls.  
cc: Client  
8-15-67

CONTINENTAL OIL COMPANY,  
a Corporation  
  
PLAINTIFF  
  
VS  
  
JEROME F. KLEIN  
  
DEFENDANT

) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY, ALABAMA  
)  
) AT LAW  
)  
) NUMBER: 7655  
)

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Comes now the Defendant in the above styled cause and  
for answer to the complaint says:

1. That the account is incorrect, to the best of  
his information and belief, in its entirety, and that he  
disputes each and every count and entry in the said account  
and items thereof.

2. The Defendant for answer to the said complaint sayth  
that he has paid the debt for the recovery of which this suit  
is brought, before the action was commenced.

3. The Defendant, as the defense to the action of  
the Plaintiff, sayth that, at the time said action was commenced,  
the Plaintiff was indebted to him in the sum of \$397.00  
for money on the 17th day of October, 1966, received by the  
Defendant for the use of the Plaintiff, which sum of money he  
hereby offers to set off against the demand of the Plaintiff,  
and he claims judgement for the excess.

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this Sept day of 1967, served a copy of the foregoing pleading or counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

STATE OF ALABAMA

BALDWIN COUNTY

*W. L. Hay*

Before me, the undersigned authority, personally appeared  
Jerome F. Klein, the Defendant in the above styled cause who,  
being known to me and being duly sworn deposes and says:

I have read the foregoing instrument in its entirety  
and know it to be true and without error.

*Jerome F. Klein*

Sworn to and subscribed before me this the 14th day of Sept, 1967.

*W. L. Hay*  
Notary Public,

**FILED**

SEP 18 1967

*Defendant demands  
trial by jury the 14th  
day of Sept, 1967  
W. L. Hay*

**ALICE J. DUCK** CLERK  
REGISTER

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 JEROME F. KLEIN 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 Bay Minette, against JEROME F. KLEIN, Defendant, by CONTINENTAL OIL COMPANY, a Corporation, Plaintiff.

WITNESS my hand this 2nd day of August, 1967.

Alice J. Luck Clerk.

CONTINENTAL OIL COMPANY, a  
Corporation,

Plaintiff,

VS.

JEROME F. KLEIN,

Defendant.

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Ø  
Ø  
Ø  
Ø

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

7655

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant TWO HUNDRED NINETY-FOUR AND 25/100 (\$294.25) DOLLARS due from him by account on, to-wit, the 1st day of January, 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-FOUR AND 25/100 (\$294.25) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 1st day of January, 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-FOUR AND 25/100 (\$294.25) DOLLARS due from him for products furnished by the Plaintiff to the Defendant between the 1st day of November,

1965, and the 31st day of December, 1966, which sum of money with the interest thereon is still unpaid.

  
E. G. RICKABY, Attorney for  
Plaintiff.

Debtors address is P. O. Box 129, Daphne, Alabama 36526.

**FILED**

AUG 2 1967

**ALICE J. DUCK** CLERK  
REGISTER

VERIFICATION OF ACCOUNTS

STATE OF Missouri )  
COUNTY OF Jackson ) SS

L. A. Giles, being first duly sworn,  
upon his oath, deposes and says that he is the Credit  
Supervisor of the CONTINENTAL OIL COMPANY, a  
corporation, of the STATE OF DELAWARE, and that as such he has  
charge of the books and accounts of the said company; that the state-  
ment of accounts of Jerome F. Klein  
hereto attached, is just, true, correct, due and wholly unpaid,  
after allowing all just credits.

L. A. Giles

Subscribed and sworn to before me this 5th day of July,  
1967.

Ruby L. Harton  
Notary Public

My Commission expires My Commission Expires May 14, 1971 19  .

Erf - 8-14-67

## ITEMIZED CREDIT CARD STATEMENT

NAME Jerome F. Klein

CREDIT CARD NUMBER 34 244 5764

BALANCE DUE \$ 294.25

[illegible]

Daphne  
Case No. 7655

Received 2 day of Aug 1967

and on 14 day of Aug 1967

I served a copy of the within 846

on Jerome J. Klein

By service on Abner Daphne

TAYLOR WILKINS, Sheriff

By Roy Randall D. S.

Continental Oil Co.  
a. corp.

Pltf.

vs.

Jerome J. Klein,  
Deft.

POB

129

Daphne, Ala.

Summons + Complaint.

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Roy Randall  
DEPUTY SHERIFF

FILED

AUG 2 1967

ALICE J. DUCK

CLERK  
REGISTER

E. D. Rickaby, Atty.

2746  
2146  
360

LAW OFFICES  
**BLACKMARR, MEADOWS AND SALIBA**  
AIRPORT BOULEVARD IN THE BEL AIR MALL BUILDING  
MOBILE, ALABAMA 36606

KEENER T. BLACKMARR  
ALICE M. MEADOWS  
WILLIAM H. SALIBA

P. O. BOX 16111  
PHONE 471-2494  
AREA CODE 205

May 7, 1969

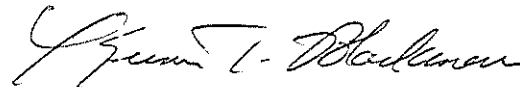
Mrs. Alice Duck, Clerk  
Circuit Court of Baldwin County  
County Courthouse  
Bay Minette, Alabama

RE: CONTINENTAL OIL COMPANY V. JEROME F.  
KLEIN, Case #7655 -- Law Side.

Dear Mrs. Duck:

Please dismiss the Counterclaim filed by the Defendant  
in the above-styled cause and send the cost bill to Mr.  
C. B. Arendall, Jr., Mobile.

Yours very truly,



KEENER T. BLACKMARR

cc: Mr. Wilson Hayes



Our File No. 67-219

Your File No. \_\_\_\_\_

Law Offices

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

CODE 205  
Telephone: 928-9836

Mailing Address  
P. O. BOX 471

May 23, 1969

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

Dear Mrs. Duck:

Inre: Continental Oil Co. vs. Jerome F. Klein  
Case No. 7655

This is a suit on an account with a counter-claim. Mr. Wilson Hayes was the attorney on the counter-claim and he tells me he has made arrangements for dismissal. As soon as the counter-claim can be dismissed with prejudice, please dismiss my suit with prejudice.

On 31 July, 1967, I deposited \$25.00 costs. Does client owe any more costs, or is anything left of that \$25.00. Please advise and give me a statement that the whole matter is dismissed with prejudice so that I may make a report to client.

Yours very truly,

*E. G. Rickarby*

EGR/jlb

cc: Mr. Wilson Hayes  
cc: Mr. C. B. Arendall, Jr.  
cc: Interstate Acceptance Corp.  
Dup.

6-26-9

*Judge Atty called + request  
you (if possible) marked  
complaint dismissed with  
prejudice & left's (whatever  
was filed) dismissed with  
Prejudice*