


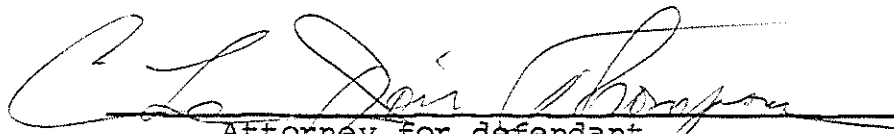
MONSANTO COMPANY	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
EUGENE R. DAVIS	X	AT LAW	NO. 8023
Defendant	X		

Comes the defendant in the above styled cause and for answer to said complaint filed in said cause shows unto this Honorable Court as follows:

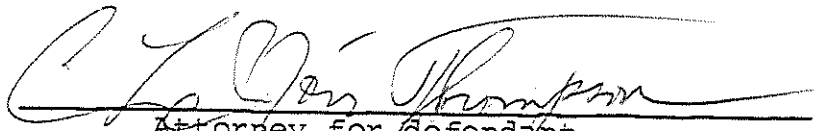
1. As to Count one, he denies the allegations thereof.
2. As to Count two, he denies the allegations thereof.
3. As to Count three, he denies the allegations thereof.


Attorney for defendant

I hereby certify that I have this 25 day of March, 1968, served a copy of the foregoing answer on Honorable Forest A. Christian, attorney for plaintiff, by depositing copy of same in the U. S. Mail, postage prepaid, properly addressed to his address in Foley, Alabama.


Attorney for defendant.

Defendant respectfully requests trial by jury.


Attorney for defendant.

FILED

MAR 25 1968

ALICE J. DUCK CLERK
REGISTER

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons EUGENE R. DAVIS, 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 MONSANTO COMPANY.

Witness my hand this the 29 day of February, 1968.

Alice J. Duck
Clerk

** ** *

COMPLAINT

MONSANTO COMPANY,

PLAINTIFF,

VS:

EUGENE R. DAVIS,

DEFENDANT.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8022

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-THREE & 80/100 DOLLARS (\$233.80), due from him by account on, to wit: the 1st day of January, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-THREE & 80/100 DOLLARS (\$233.80), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of February, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED THIRTY-THREE & 80/100 DOLLARS (\$233.80), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of February, 1968, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement 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 21st day of February, 1968.

ATTORNEY FOR THE PLAINTIFF

Forest K. Christian
Forest K. Christian

Defendant's address:

Route 2, Box 209
Daphne, Alabama

FILED

FEB 29 1968

Monsanto
C O M P A N Y

Eugene R. Davis
Rpute 2 Box 209
Daphne, Alabama

IMPORTANT: IF PURCHASES AND PAYMENTS MADE NEAR THIS STATEMENT DATE ARE NOT REFLECTED, THEY WILL APPEAR ON THE NEXT MONTH'S STATEMENT. ANY DIFFERENCES SHOULD BE REPORTED PROMPTLY. ANY PAYMENTS ON THIS ACCOUNT SHOULD BE DIRECTED TO THE LOCK BOX SHOWN ON OUR INVOICES.

FORM 271 REV. 4-65

* TRANSACTION CODE: 1 INVOICE - 2 DEBIT MEMO - 3 CREDIT MEMO - 4 CASH - 5 VOUCHER - 6 JOURNAL ENTRY - 7 BALANCE FORWARD

AFFIDAVIT

STATE OF MISSOURI)

COUNTY OF ST. LOUIS)

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared

W. E. DuBois, known to me, who being duly sworn upon his oath stated that he is the Regional Supervisor Agricultural Credit Dept. of officer

MONSANTO COMPANY, organized and doing business under the laws of the State of Delaware, that as

such he makes this affidavit, that he is familiar with the books and business of MONSANTO COMPANY, that the

attached account against Eugene R. Davis

is just and correct, within the knowledge of the affidavit, that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein, that the items thereon stated composing the said account, were sold and delivered to the above mentioned debtor at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said debtor is entitled as thereon stated, and that the balance thereof, amounting to the sum of \$233.80 with interest from February 1, 1968, is justly due and remains unpaid.

W. E. DuBois
Affiant W. E. DuBois

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, with my seal hereto affixed on this the 21 day of February, 1968.

Affix Seal:

Evelyn H. Huley
Notary Public

My Commission Expires: 11-16-71



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Feb 68
March 68
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Eugene R. Davis
about
Be Grant
TAYLOR WILKINS Sheriff
By Randall

8023

SUMMONS AND COMPLAINT

MONSANTO COMPANY,

PLAINTIFF,

VS:

EUGENE R. DAVIS,

DEFENDANT.

50
Total \$ 5.00
TAYLOR WILKINS, Sheriff
By Roy Randall
DEPUTY SHERIFF

FILED

FEB 29 1968

ALICE J. DUCK

CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535