

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III
JOHN S. GONAS, JR.

August 6, 1968

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

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

8259

Re: ~~Standard Oil Company of Kentucky, a corporation, vs~~
Robert E. Etheridge

Dear Mrs. Duck:

I enclose a complaint as styled above, for filing. Please process the same in your usual efficient manner.

Sincerely yours,


B. F. Stokes, III

BFS:fo
Enclosure

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8259

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Robert E. Etheridge

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

Robert E. Etheridge, Defendant

by Standard Oil Company of Kentucky, A Corp.

Plaintiff

Witness my hand this 8 day of Aug 1968

Clifford M. ..., Clerk

Ex Aug 16, 1968

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

STANDARD OIL COMPANY OF KENTUCKY, A Corporation Plaintiffs

vs.

ROBERT E. ETHERIDGE Defendants

SUMMONS AND COMPLAINT

Filed 8/8/68 19

Alice J. Duck Clerk

TAYLOR WILKINS, SHERIFF OF BALDWIN COUNTY, ALABAMA, CLAIM \$1.50 EACH FOR SERVING 1 PROCESS(ES) AND TRAVEL EXPENSE ON EACH OR \$7.00 PROCESS(ES) OR A TOTAL OF \$8.50

Gibbons & Stokes Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

8/8 1968 Taylor Wilkins Sheriff

I have executed this summons this Aug 16 1968 by leaving a copy with

Robert E. Etheridge

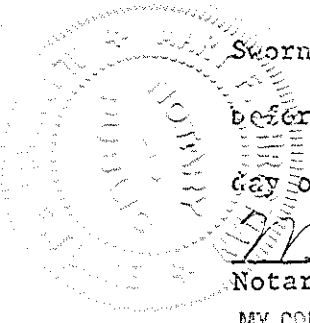
Taylor Wilkins Sheriff Roy Rowell Deputy Sheriff

STATE OF ALABAMA

COUNTY OF JEFFERSON

Before me, the undersigned authority in and for said county in said State, personally appeared JAMES H. NEAL, who having been by me first duly sworn, deposes and says that he is CREDIT MAN of STANDARD OIL COMPANY OF KENTUCKY the claimant, and that he has full and complete knowledge of the account against ROBERT ETHERIDGE and that \$ 393.13 the amount claimed, is justly due after allowing all proper credits.

James H. Neal



Sworn to and Subscribed

before me this the 10

day of June 1968

Mary J. Christian
Notary Public

MY COMMISSION EXPIRES DEC. 14, 1969

FILED

AUG 8 1968

ALICE J. DUCK CLERK REGISTER

672

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III
JOHN S. GONAS, JR.

September 23, 1968

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

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

Re: Standard Oil Co. of Ky. vs. Robert E. Etheridge,
Case No. 8259

Dear Mrs. Duck:

I received your advice that the defendant was served on August 8th. I enclose a motion for judgment by default in the sum of \$415.43, which includes the balance of \$383.13 plus interest at 6% as provided by law. I also enclose a non-military affidavit. Please present this matter to the Judge at your earliest convenience for judgment by default and if such judgment is rendered, please forward to me a certificate of judgment, along with your statement of any charges which might be incurred.

Sincerely yours,


B. F. Stokes, III

BFS:mi
Encl.

STANDARD OIL COMPANY OF) IN THE CIRCUIT COURT OF
KENTUCKY, a corporation,)
Plaintiff)
BALDWIN COUNTY,
ALABAMA
VS:) AT LAW
ROBERT E. ETHERIDGE,)
Defendant,) CASE NO. 8259

MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and shows unto the Court that the Defendant herein was served with the complaint and summons on, to-wit, August 8, 1968 and is in default in that he has not answered said complaint.

WHEREFORE, Plaintiff moves the Court to enter judgment by default in the sum of \$415.43.



B. F. STOKES, III
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama 36601

STANDARD OIL COMPANY OF
KENTUCKY, a corporation,

Plaintiff

VS:

ROBERT E. ETHERIDGE,

Defendant;

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY,
)
) ALABAMA

) AT LAW

)

) CASE NO. 8259

MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and shows unto the Court that the Defendant herein was served with the complaint and summons on, to-wit, August 8, 1968 and is in default in that he has not answered said complaint.

WHEREFORE, Plaintiff moves the Court to enter judgment by default in the sum of \$415.43.



B. F. STOKES, III
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama 36601

STANDARD OIL COMPANY OF
KENTUCKY, a corporation,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,
~~MOBILE COUNTY~~

PLAINTIFF,

ALABAMA

-versus-

AT LAW

ROBERT E. ETHERIDGE,

DEFENDANT.

CASE NO. 8259

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF MOBILE)

Now comes, B. F. Stokes, III,
who being first duly sworn, deposes and says that the defendant
herein, Robert E. Etheridge,
was not at the time of filing of this suit, and is not now
in the Military or Naval Service of the United States.

The Defendant resides at 505 Volanta Avenue, Fairhope,
Alabama.

B. F. Stokes, III

Sworn to and Subscribed before me,
this 23rd day of September, 1968.

Michael K. Smith
~~XX~~
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED _____

Clerk.

ITEMIZED STATEMENT

STANDARD OIL COMPANY

INCORPORATED IN KENTUCKY

Folio

P. O. BOX 2654
BIRMINGHAM, ALA. 35202

JUNE 10 19 68

+ ROBERT ETHERIDGE

100-832-240-4

DATE	EXPLANATION	CHARGES	PAYMENTS	BALANCE
9/66		22.66		
8/66		40.67		
10/66		27.22		
11/66		31.74		
12/66		36.04		
1/67		49.63		
2/67		51.31		
3/67		31.47		
4/67	Unbilled Terms	102.39		
	BALANCE DUE			393.13
	FILED			
	AUG 8 1968			
	ALICE J. DICK CLERK			
	REGISTER			

STANDARD OIL COMPANY OF
KENTUCKY, a corporation

Plaintiff

VS

ROBERT E. ETHERIDGE

Defendant


) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) Case No. 8259

Plaintiff claims of the defendant \$393.13 due from him by account on April 1, 1967, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.


B. F. Stokes, III, Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama

Serve the defendant at 505 Volanta Avenue, Fairhope, Alabama

FILED

AUG 8 1968

ALICE J. BUCK CLERK
REGISTER