

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P. O. DRAWER 190
AREA CODE 205 - PHONE 943-2201
FOLEY, ALABAMA 36535

April 28, 1969

Hon. Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: Pure Oil Division, Union
Oil Company, of California,
a California corporation.
Vs: R. B. Davis
Case No. 8594

Dear Judge Mashburn:

Kindly render a judgment in this case based on
a sworn to itemized statement of account in amount
of \$285.69. No interest is added.

Cordially yours,


FOREST A. CHRISTIAN

FILED

APR 29 1969

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 R. B. 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 PURE OIL DIVISION, UNION OIL COMPANY of California, a California corporation.

Witness my hand this the 5th day of March, 1969.

Clerk 

** ** *

COMPLAINT

PURE OIL DIVISION, UNION	X	
OIL COMPANY of California,	X	IN THE CIRCUIT COURT OF
a California corporation,	X	
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
R. B. DAVIS,	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-FIVE & 69/100 DOLLARS (\$285.69), due from him by account on, to wit: the 4th day of January, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-FIVE & 69/100 DOLLARS (\$285.69), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 4th day of January, 1969, which sum of money, with interest thereon is still unpaid.


COUNT III:

The Plaintiff claims of the Defendant TWO HUNDRED EIGHTY-FIVE & 69/100 DOLLARS (\$285.69), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant, on, to wit: the 4th day of January, 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 24th day of February, 1969.

Defendant's address:

1647 Twelfth Street South
Robertsdale, Alabama 36567
or
P. O. Box 290
Robertsdale, Alabama 36567


Forest A. Christian, Attorney for the Plaintiff

FILED

MAR 5 1969

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ALICE J. DUCK

CLERK
REGISTERED

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

W. R. Tucker, Jr. being first duly sworn, says that he is Collection
Manager of Pure Oil Division, Union Oil Company of California, A Cali-
fornia Corporation; that there is due and owing to Union Oil Company of California,
from R. B. Davis on an account for goods, wares and merchan-
dise sold and delivered, statement of account showing balance due which is attached
hereto and made a part hereof; that there are no off-sets or counter claims, and that
no part of said claim 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, from
said R. B. Davis the sum of Three-hundred, Twenty-three
and 64/100 dollars (\$323.64).

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. A. Tucker, Jr.

Subscribed and sworn to before me
this 24th day of February, 1969

Notary Public in and for
Cook County, Illinois

MY COMMISSION EXPIRES OCTOBER 24, 1972

8594

Received 5 day of March 1969
delivered on 5 day of March 1969
served a copy of the within N.C.
R. B. Davis
by service on

TAYLOR WILKINS, Sheriff

H. Brown D. S.

Roberts Dale
50 miles R. T.

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Brown
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

PURE OIL DIVISION, Union Oil
Company of California, a
California corporation,

PLAINTIFF,

VS:

R. B. DAVIS,

DEFENDANT.

FILED

MAR 5 1969

ALICE J. DUCK CLERK
REGISTER

LAW OFFICE OF
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