

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 California Corporation; that there is due and owing to Union Oil Company of California, from J. W. Joiner, Jr. on an account for goods, wares and merchandise 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 J. W. Joiner, Jr. the sum of One-hundred, forty-nine
and 37/100-----dollars (\$ 149.37).

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

Ch. R. Tucker, Jr.
Collection Manager

Subscribed and sworn to before me

this 22nd day of January, 19 69

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

MY COMMISSION EXPIRES OCTOBER 24, 1972

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. W. JOINER, JR., 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 19 day of May, 1969.

Alice J. Luck
Clerk

** ** *

COMPLAINT

PURE OIL DIVISION, Union Oil	X	
Company of California, a		
California corporation,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
J. W. JOINER, JR.,	X	
	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him by account on, to wit: the 1st day of December, 1967, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of December, 1969, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of December, 1967, 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 22nd day of January, 1969.

Defendant's address

is:

Bay Minette, Alabama 36507

Forest A. Christian
Forest A. Christian, Attorney for
Plaintiff

MAY 19 1969

ALICE J. LUCK
CLERK
REGISTERED

COPY

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P. O. DRAWER 190
AREA CODE 205 - PHONE 943-2201
RES. 943-7102
FOLEY, ALABAMA 36535

September 8, 1969

Honorable Taylor Wilkins
Sheriff
Bay Minette, Alabama 36507

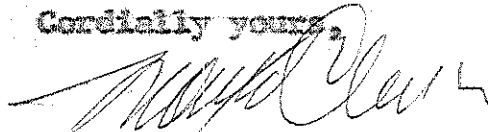
Re: Pura Oil Company
Vs: J. W. Joiner, Jr.
Case No. 8707

Dear Taylor:

We filed suit in this case and it is reported "Not Found". A post office address was given. However, we have checked this and we find that a James W. Joiner, Route, Box 94, Foley, Alabama, who is about 39 years old and used to work for International Paper Company, but was somehow injured and is unable to work, but gets a disability check.

However, now and then he works for his father-in-law in Wallace's Grocery at Cross Roads. Accordingly, we hope that you will be able to serve him soon.

Cordially yours,



FOREST A. CHRISTIAN

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

July 22, 1970

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

Re: Pure Oil Company
Division of Union Oil
Vs: J. W. Joiner, Jr.
Case No. 8707

Dear Judge Mashburn:

We find that you have set the above case for Wednesday, July 29. The file shows that this Defendant was not found, but we have information that he used to work at the International Paper Company, Mobile, was somehow injured and is unable to work. He receives a disability check.

→ The account amounts to approximately \$150.00. We have paid the Clerk \$20.00 for Court costs, but I assume that this would barely cover the minimum amount of court costs.

Accordingly, I think the proper thing to do is for your Honor to take a non-suit in this case and account for any court costs.

Cordially yours,

anon Suet

Forest A. Christian
FOREST A. CHRISTIAN

NOTE TO CLERK: Please place on docket sheet.

SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. W. JOINER, JR., 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 19 day of May, 1969.


Clerk

** ** *

COMPLAINT

PURE OIL DIVISION, Union Oil	X	
Company of California, a		
California corporation,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA
VS:	X	AT LAW
J. W. JOINER, JR.,	X	8707
	X	
DEFENDANT.	X	

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him by account on, to wit: the 1st day of December, 1967, which sum of money, with interest thereon, is still unpaid.

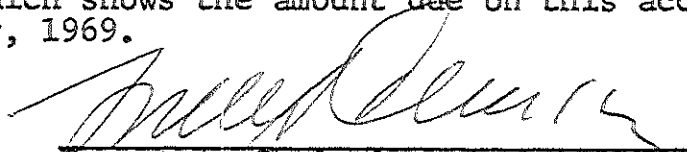
COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of December, 1969, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED FORTY-NINE & 37/100 DOLLARS (\$149.37), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of December, 1967, 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 22nd day of January, 1969.


Forest A. Christian, Attorney for
Plaintiff

Defendant's address
is:
Bay Minette, Alabama 36507

MAY 19 1969

FILED
CLERK
ALICE D. DUCK

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 J. W. Joiner, Jr. 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 J. W. Joiner, Jr. the sum of One-hundred, fourty-nine
and 37/100-----dollars (\$ 149.37).

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.
Collection Manager

Subscribed and sworn to before me

this 22nd day of January, 19 69

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

MY COMMISSION EXPIRES OCTOBER 24, 1972

FILED

MAY 19 1969

ALICE J. DUCK CLERK
REGISTER

M.F.

STATEMENT

Pure Oil Division 
 Union Oil Company of California

union 76

04-4005-270-2

J. W. Joiner, Jr.P. O. Box 902Bay Minette, Alabama

DATE		ITEM	CHARGES		CREDITS		BALANCE	
4	67		31	67			31	67
5	67		18	20			49	87
6	67	.74	7	12			56	99
7	67	.85	34	85			91	84
8	67	1.37	7	37			99	21
9	67	1.48	45	79			145	00
10	67	2.17	2	17			147	17
11	67	2.20	2	20			149	37
12	67						149	37
1	68						149	37
2	68						149	37
3	68						149	37
4	68						149	37
5	68				149	37		
6	68							
7	68							
	68		149	37			149	37

STATEMENT

Pure Oil Division 

Union Oil Company of California



04-4005-270-2

J. W. Joiner, Jr.

P. O. Box 902

Bay Minette, Alabama

DATE		ITEM	CHARGES		CREDITS		BALANCE	
4	67		31	67			31	67
5	67		18	20			49	87
6	67	.74	7	12			56	99
7	67	.85	34	85			91	84
8	67	1.37	7	37			99	21
9	67	1.48	45	79			145	00
10	67	2.17	2	17			147	17
11	67	2.20	2	20			149	37
12	67						149	37
1	68						149	37
2	68						149	37
3	68						149	37
4	68						149	37
5	68				149	37		
6	68							
7	68							
8	68		149	37			149	37

8707

SUMMONS AND COMPLAINT

PURE OIL DIVISION, Union Oil
Company of California, a
California Corporation,
PLAINTIFF,

VS:

J. W. JOINER, JR.,

DEFENDANT.

FILED

MAY 19 1969

ALICE J. DUCK CLERK
REGISTER

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

Not found
Not found in my county after diligent search and in-
quiry.

day of

1969

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Received

day of

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I served a copy of the within on
J. W. Joiner, Jr.

By service on
TAYLOR WILKINS, Sheriff
By D. S.