GULF REFINING COMPANY, a corporation,) (
Plaintiff,) (IN THE CIRCUIT COURT OF
-vs-	, ,	BALDWIN COUNTY, ALABAMA
ROY BEESLEY, individually and doing business as BEESLEY PLUMBING COMPANY,) (AT LAW NO. 1 4 8 8
Defendant.) () (

Comes the defendant in the above entitled cause and demurs to the complaint and separately and severally to each count thereof and for grounds of demurrer assigns separately and severally the following:-

- 1. Said complaint states no cause of action.
- 2. Said complaint, as filed on the defendant, is incomplete.
- 3. Said complaint, as served on the defendant, does not contain an itemized statement alleged to be a part of said complaint.
 - 4. The counts of said complaint are not numbered.
 - 5. Several causes of action are joined in one count.

Attorney for Defendant

Defendant demands a trail

by jury:

Attorney for Defendant

Jun

DEMURRERS TO

BILL OF COMPLAINT

GULF REFINING COMPANY, a corporation,

Plaintiff,

-VS-

ROY BEESLEY, individually and doing business as BEESLEY PLUMBING COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 1 4 8 8

CECIL G. CHASON ATTORNEY AT LAW FOLEY, ALABAMA

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to summon ROY BEESLEY, Individually, and doing business as BEESLEY PLUMBING COMPANY, to appear, and plead, answer or demur, within thirty days from the service hereof to the complaint filed in the Circuit Court of the Twenty-Eighth Judicial Circuit of Alabama, at Bay Minette, against ROY BEELSEY, Individually, and doing business as BEESLEY PLUMBING COMPANY, by the GULF REFINING COMPANY, a corporation.

WITNESS my hand this the 24th day of April, 1950.

<u>Ancel-wuck</u>
(Clerk

COMPLAINT

GULF REFINING COMPANY, a Corporation,

Plaitiff

IN THE CIRCUIT COURT OF

THE TWENTY EIGHTH JUDICIAL

CIRCUIT OF ALABAMA

AT LAW

VS.

ROY BEESLEY, Individually and doing business as BEESLEY PLUMBING COMPANY

Defendant

Count 1

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY SIX & 87/100 DOLLARS (\$126.87), due from by account, on to wit: the 11th day of April, 1950, which sum of money with interest thereon, is still unpaid.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED TWENTY SIX & 87/100 DOLLARS (\$126.87), due from him on account stated between the Plaintiff and the Defendant on, to wit: the llth day of April, 1950, which sum of money, with interest thereon, is still unpaid.

The Plaintiff claims of the defendant the sum of ONE HUNDRED TWENTY SIX & 87/100 DOLLARS (\$126.87), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 11th day of April, 1950, whoch sum of money, with interest thereon is still unpaid.

Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of the amount of this claim, verified by the affidavit of a competent witness, made before and certified to by a Notary Public, which shows the amount owed on this claim as of the 11th day of April, 1950.

For & GOlewitte

THE STATE OF LOUISIANA.) PARISH OF ORLEANS

Before me, the undersigned Notary Public, within and for the Parish and State aforesaid, on this day
personally appeared E. W. WARRICK, known to me, who, being by me duly sworn, states on oath that the
foregoing and annexed account in favor of GULF REFINING COMPANY, which is a corporation organized
and existing under the laws of the State of Delaware, and of which corporation affiant is the authorized
CREDIT MANAGER. And which account is against Deesley Plumbing Co-
for the sum of he har died twenty six & F1/100 - Dollars,
is within the knowledge of affiant, just and true; that it is due and that all just and lawful offsets, payments
and credits have been allowed
<u>6 www.rnelc</u>
Sworn to and subscribed before me, this day of A. D., 1950
ally . The Survelle
Notary Public.

STATEMENT



WE SEND OUT STATEMENTS FOR COM-PARISON ON THE FIRST OF EACH MONTH WHETHER ACCOUNT IS DUE OR NOT.

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STROLEUM AND ITS PRODUCTS

GULF REFINING COMPANY

MAISON BLANCHE BLDG. . NEW ORLEANS 16, LA.

PLEASE DETACH THIS COUPON AND MAIL WITH YOUR CHECK, TO OUR BULK STATION FROM WHICH YOU RECEIVE DELIVERIES, AS INDICATED ON OUR INVOICES. RETAIN LOWER PORTION FOR YOUR RECORDS. REMITTANCES WILL BE 4CKNOWLEDGED ONLY WHEN SPECIFICALLY REQUESTED. AS YOUR PAID CHECK CONSTITUTES A PROPER RECEIPT.

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GULF REFINING COMPANY LEDGER ___

PAYMENT RECEIVED AFTER CLOSE OF MONTH WILL BE CREDITED TO YOUR ACCOUNT ON NEXT STATEMENT

TATEMENT



WE SEND OUT STATEMENTS FOR COMPARISON ON THE FIRST OF EACH MONTH WHETHER ACCOUNT IS DUE OR NOT.

ETROLEUM AND ITS PRODUCTS

GULF REFINING COMPANY

MAISON BLANCHE BLDG. . NEW ORLEANS 16, LA.

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TAYLOR WILKINS, Shering

no.1488

Especited may 9-1950 Ry Serving copy on Roy Bresley

Sheriff Jaylor Wilkins By Edleigh Steadham

SUMMONS & COMPLAINT

GULF REFINING COMPANY, aCorporation,

Plaintiff

VS.

ROY BEESLEY, Individually, and doing business as BEESLEY PLUMBING COMPANY

Defendant

IN THE CIRCUIT COURT OF
THE TWENTY EIGHT JUDICIAL
CIRCUIT OF ALABAMA

AT LAW

APR 24 1950

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LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

30 October 1950

Mr. Forest Christian Attorney at Law Foley, Alabama

Dear Forest:-

I have this day been informed by Roy Beesley, the defendant in case number 1488 wherein the Gulf Refining Company is plaintiff; in case number 1496 wherein Good Housekeeping Appliance Company is plaintiff, that no defense will be interposed in the trial of these cases.

Yours very truly,

C. G. Chason

CGC:lu

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