### FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201 FOLEY, ALABAMA 36535

December 24, 1969

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

Re: Standard Oil Company Vs: E. J. Johnson

Case No. 8919

Dear Judge Mashburn:

Kindly render a judgment by default on a sworn to itemized statement of account for principal amount of \$400.00 plus interest of \$26.00 for a total of \$426.00.

Cordially your

FOREST A. CHRISTIAN

### SUMMONS

STATE OF ALABAMA, )

COUNTY OF BALDWIN. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons E. J. JOHNSON, 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 STANDARD OIL COMPANY, a division of Chevron Oil Company, a California Corporation.

WITNESS my hand this the \_\_\_\_\_day of October, 1969.

Clerk Duch

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# COMPLAINT

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STANDARD OIL COMPANY, a division)

of Chevron Oil Company, a California Corporation,

IN THE CIRCUIT COURT OF

PLAINTIFF, X

BALDWIN COUNTY, ALABAMA

vs:

X AT LAW

E. J. JOHNSON,

x 89/9

DEFENDANT. X

### COUNT I

The Plaintiff claims of the Defendant FOUR HUNDRED & 00/100 DOLLARS (\$400.00) due from him by account on, to wit: the 1st day of October, 1967, which sum of money, with interest thereon, is still unpaid.

# COUNT II

The Plaintiff claims of the Defendant FOUR HUNDRED & 00/100 DOLLARS (\$400.00), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 1st day of October, 1967, which sum of money, with interest thereon, is still unpaid.

# COUNT III

The Plaintiff claims of the Defendant FOUR HUNDRED & 00/100 DOLLARS (\$400.00) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 1st day of October, 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, swometo before a notary public, which shows the amount due on this account as of the 10th day of September, 1969.

\* VOL

Attorney for Plaintiff

Forest A. Christian, Foley, Alabama

Defendant's address: 125 Confederate Drive Spanish Fort, Alabama

GGT 7 1969

#### ITEMIZED STATEMENT

# STANDARD OIL COMPANY

Folio

P. O. BOX 2654 BIRMINGHAM, ALA. 35202

September 10, 19 69

E. J. JOHNSON
125 CONFEDERATE DRIVE
Spanish Fort, Alabama

DATE	EXPLANATION	CHARGES		PAYMENTS		BALANCE		
10/31/6	5	\$ 465	45	\$		\$		
11/66		683	99					
12/66		424	63	683	99			
1/67		278	92				:	
2/67		310	99					
3/67		28	69	300	00			
4/67		10	52					
8/67				419	20			
9/67		P age on principle to the control of		40	00			
		BAL	NGE	DUE		Ş	400	00
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STATE OF ALABAMA
COUNTY OFJEFFERSON
Before me, the undersigned authority in and for said county in
said State, personally appeared,
who having been by me first duly sworn, deposes and says that
he isCREDIT MAN ofSTANDARD OIL COMPANY,
A DIVISION OF CHEVRON OIL COMPANY, A CALIFORNIA CORPORATION ,
the claimant, and that he has full and complete knowledge of
the account against E. J. JOHNSON and that
\$ 400.00 the amount claimed, is justly due after
allowing all proper credits.
James & Haal
Sworn to and Subscribed
before me this the 10th
day of September, 19 69
230 J Chustin
Notary Public  Wer COMMISSION EXPIRES DEC. 14, 1969

24/10-16-69

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By service or

STANDARD OIL COMPANY,

PLAINTIFF,

VS:

E, J. JOHNSON,

BEFENDANT.

OCT 7 1969

ALLE J. BUDY CLERK REGISTER

LAW OFFICE OF FOREST A. CHRISTIAN (205) 943-2201

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