

STATE OF ALABAMA)
) IN THE CIRCUIT COURT . . LAW SIDE .
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERT E. GODSEY to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of BOLLER PETROLEUM, INC., a corporation.

WITNESS my hand this the 24 day of Oct., 1970.

Alice J. Duck
Clerk

COMPLAINT

BOLLER PETROLEUM, INC.,
a corporation

Plaintiff,

-VS-

ROBERT E. GODSEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9521

COUNT I

The Plaintiff claims of the Defendant Nine Hundred Eighty-two and 43/100 Dollars (\$982.43) due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant between, to-wit: February 22, 1969 and May 31, 1970, which sum of money with the interest thereon from June 1, 1970, is still unpaid. An itemized statement of account, verified by affidavit, is attached hereto pursuant to Section 378 of Title 7 of the Code of Alabama of 1940 Recompiled 1958.

Thomas W. Anderson
Attorney for Plaintiff

FILED

OCT 24 1970

Defendant may be served at
Foley, Alabama

ALICE J. DUCK CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BOLLER PETROLEUM, INC., a
corporation,

Plaintiff,

-vs-

ROBERT E. GODSEY,

Defendant.

SUMMONS AND COMPLAINT

CECIL G. CHASON

THOMAS W. UNDERWOOD, JR.
ASSOCIATE

Attorney at Law

October 23, 1970

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

Mrs. Eunice Blackmon
Office of Clerk of Court
Bay Minette, Alabama

9521

Dear Mrs. Blackmon:

Re: Boller Petroleum, Inc.
vs
Robert E. Godsey

I am enclosing original complaint and one copy
to be served on the Defendant in the above styled
cause. Thank you.

Yours very truly,

Thomas W. Underwood, Jr.
Thomas W. Underwood, Jr.

TWU: dmc

Encl.

Foley, Ala., Aug. 17 19 70

Boller Petroleum, Inc.

TIRES - BATTERIES - ACCESSORIES

P.O. Box 309, Foley, Ala. 36535

PHONES 943-3611 — 943-5277

Robert E. Godsey

P.O. Box 999,

Foley, Ala.

Total Consignment Account	783 53
Less Credits Advse Ret	
Chgs 8818 through 8845	159 53
	<u>624 00</u>
Total Open Account	
Boller Petroleum, Inc	390 42
Bollers Services Account	70 48
Checks Returned	
'Not Sufficient Funds'	1376 00
	<u>2460 90</u>
Credit Equipment Purchased	
From R. E. Godsey	1060 15
	<u>1400 75</u>
Credit Oil, Anti Freeze, Candy,	
Soft Drinks and Cash	
Credit Memos - 8834 through 8840	418 32
	<u>982 43</u>

STATE OF ALABAMA

BALDWIN COUNTY.

Before me, _____, a Notary Public in and for said County in said State, personally appeared W. A. Boller, who is known to me, and who, after being by me first duly and legally sworn, deposes and says that he is President of Boller Petroleum, Inc., a corporation, and a Director of said corporation, and as such is familiar with the accounts of said corporation; that the foregoing statement of account of said firm against Robert E. Godsey is just, true and correct, and that there is now due on said account to Boller Petroleum, Inc., a corporation, the sum of Nine Hundred Eighty-two and 43/100 Dollars (\$982.43) plus accrued interest thereon, after deducting all just credits, off-sets or counter claims.

W.A. Boller

Sworn to and subscribed before me
on this the _____ day of _____, 1970.

Notary Public, Baldwin County, Alabama

9521

BOLLER PETROLEUM, INC., A CORP.,

VS:

ROBERT E. GODSEY

FILED

OCT 24 1970

ALICE J. DUCK

CLERK
REGISTER

Thomas Underwood &
C.G. Chason, Atty.

Received 24 day of Oct 1970
and on 13 day of Oct-Nov 70
I served a copy of the within I.C.
on Robert E. Godsey
By service on _____

TAYLOR WILKINS, Sheriff
by Charles Chason

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY Charles Chason
DEPUTY SHERIFF

BOLLER PETROLEUM, INC.
a corporation,

Plaintiff,

vs.

ROBERT E. GODSEY,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 9521

PLEA

Comes now the Defendant in the above styled cause by his attorneys and for answer to the Complaint heretofore filed against him says as follows:

1. The allegations of the Complaint are untrue.

Respectfully submitted,

CHASON, STONE & CHASON

By: M. J. Stone

FILED

NOV 16 1970

ALICE J. DUCK CLERK
REGISTER

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 16 day of November, 1970.

M. J. Stone

BOLLER PETROLEUM, INC.,
a corporation,

Plaintiff,

vs.

ROBERT E. GODSEY,

Defendants.

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

) AT LAW
)
)

) CASE NO. 9521
)

REPLICATION

Comes now the Plaintiff in the above styled cause by its attorneys, and in reply to the Defendant's plea heretofore filed says as follows:

1. The Plaintiff joins issue on said plea.

Thomas W. Underwood Jr.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Replication has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 1 day of December, 1970.

Thomas W. Underwood Jr.

FILED

DEC 2 1970

ALICE J. DUCK

CLERK
REGISTER