

UNION OIL COMPANY, EASTERN REGION,)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	AT LAW
vs.)	
H. VAUGHN KEY,)	CASE NO. <u>9916</u>
Defendant)	

C O M P L A I N T

COUNT I

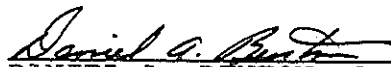
The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINE HUNDRED THREE AND 41/100 DOLLARS (\$1903.41) due him by account on, to-wit, the 21st day of April, 1970, which sum of money with interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

COUNT II

The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINE HUNDRED THREE AND 41/100 DOLLARS (\$1903.41) due him by account on, to-wit, the 21st day of April, 1970, which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of ONE THOUSAND NINE HUNDRED THREE AND 41/100 DOLLARS (\$1903.41) due him for merchandise, goods, and chattels sold by the Plaintiff to the Defendant on, to-wit, the 21st day of April, 1970, which sum of money, with interest, is still unpaid.


DANIEL A. BENTON, Attorney for Plaintiff

OF COUNSEL:

RICKARBY & BENTON
Fairhope, Alabama

Defendant can be served at
Route 4, Seminole, Alabama

FILED

JUL 12 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ILLINOIS)
) SS
COUNTY OF MC HENRY)

W. R. Tucker, Jr. being first duly sworn, says that he is Collection Manager
_____ of Union 76 Division, Union Oil Company of California, A Cali-
fornia Corporation; that there is due and owing to Union Oil Company of California,
from H. Vaugh Key _____ 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 H. Vaugh Key _____ the sum of One Thousand Nine Hundred
Three and 41/100 _____ dollars (\$ 1,903.⁴¹/₁₀₀).

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

Subscribed and sworn to before me
this 25 day of JUNE, 19 71

D. L. Friedberg
Notary Public in and for

M^C HENRY County, Illinois

MY COMMISSION EXPIRES MARCH 31, 1975.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon H. VAUGHN KEY

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, State of Alabama, at Bay Minette against.....

H. VAUGHN KEY Defendant.....

by
UNION OIL COMPANY, EASTERN REGION, a corporation, Plaintiff.....

Witness my hand this 12 day of July 19 71

James B. Blackburn Clerk

No. 9916 Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

UNION OIL COMPANY, EASTERN.....
REGION, a corporation

Plaintiffs

VS.

H. VAUGHN KEY.....

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

JUL 12 1971

Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

RICKARBY & BENTON
Fairhope, Alabama

Plaintiff's Attorney

DEC 8 1971 Defendant's Attorney

Works - Eastern Shore
Auto Sales - Green Rd.
Defendant lives at Shope

Route 4

Seminole, Alabama

Recieved In Office

July 12 1971

Taylor Wilkins Sheriff

I have executed this summons

this Dec 12 1971

by leaving a copy with

BR

H. Vaughn Key

Sheriff claims 50 miles at

Ten Courts per mile Total 500

T. Wilkins Sheriff

W. Brown Deputy Sheriff

[Handwritten signatures and stamps]
Returned DEC 13 1971
Not found in my court
Day of July 1971
at Shope
Sheriff
Deputy Sheriff
Brown

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2508

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

January 21, 1972

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: Union Oil Company v. H. Vaughn Key
Case No. 9916, at Law

Dear Judge Mashburn:

We request judgment by default in this matter for a total of \$2103.26, which includes principal of \$1903.41 and interest of \$199.85, said interest being from the 21st day of April, 1970, and, of course, for court costs in this matter. This is submitted on the original complaint, itemized and verified statement of account, and personal service was obtained on Mr. Key on December 12, 1971.

Respectfully submitted,


Daniel A. Benton

DAB:w

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW

E. G. RICKARBY
DANIEL A. BENTON

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FAIRHOPE, ALABAMA 36552

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(205) 928-2308

January 21, 1972

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

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December 1, 1971

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: Union Oil Company v. H. Vaughn Key
Case No. 9916, at Law

Dear Sir:

I noticed that this case is set for Wednesday, December 15, on the non-jury court calendar. This is to advise that we have been unable to obtain service of process on Mr. Key because his whereabouts is unknown. We just learned his whereabouts on November 29 and have written a letter to the Sheriff, asking him to attempt to procure service, and therefore respectfully request that this case be continued to give us another opportunity to obtain service of process.

Respectfully submitted,



Daniel A. Benton

DAB:w
cc-Clerk of the Circuit Court

FILED
DEC 7 1971
LUNICE B. BLACKMON CIRCUIT CLERK

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DANIEL A. BENTON
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(205) 928-2308

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TELEPHONE
(205) 636-2608

December 1, 1971

Honorable Taylor Wilkins
Sheriff of Baldwin County
Bay Minette, Alabama 36507

Attention: Deputy Tom Byrd

Re: Union Oil Company v. H. Vaughn Key
Case No. 9916, at Law

Dear Sir:

This case has been in Bay Minette for quite some time and, as I recall, there was some difficulty in finding this fellow to have service on him. I requested information from the forwarding agent and he recently sent me a letter which indicates that he is still living at Route 4, Seminole, Alabama, but that he works at Eastern Shore Auto Sales on Greeno Road in Fairhope.

I would appreciate it very much if you would attempt service on him once again and advise me of the progress.

Yours very truly,

Daniel A. Benton

DAB:w
cc-Mrs. Eunice Blackmon
Clerk of the Circuit Court

Blind -- Dear Eunice, if this has been returned to your office because service could not be obtained, please forward it back to the Sheriff's office.

D.A.B.