

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

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 Ella Sanspree

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.....

~~...Ella Sanspree, A.B.C. either individuals, partner, and/or Corps..~~ Defendant.....

by Monsanto Company, a corporation

....., Plaintiff.....

Witness my hand this.....22nd.....day of.....September.....19.71.

Eunice B. Blackburn, Clerk

MONSANTO COMPANY,
A Corporation,

Plaintiff,

VS:

ELLA SANSPREE, A,B,C,
either individuals,
partner, and/or
corporations, whose exact
names are otherwise unknown
at this time, but will be
substituted at a later date
when ascertained, who are
the same individuals, part-
nerships or corporations
that are indebted to the
plaintiff,

Defendants.

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

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: CASE NO. 10,036

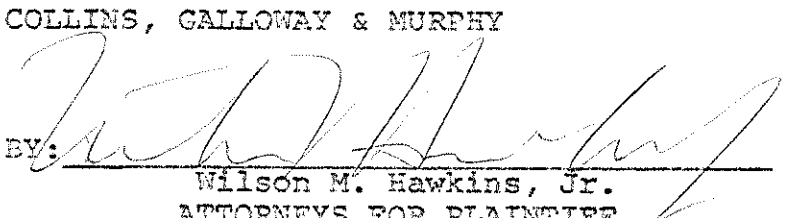
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The plaintiff claims of the defendant NINE HUNDRED
FIVE AND 60/100 (\$905.60) DOLLARS, due from it by account on,
to-wit, the 31st day of March, 1968, which sum of money, with
the interest thereon, is still unpaid.

This suit is brought on an itemized, verified state-
ment of the account, which will be offered into evidence at the
trial, and which statement is attached hereto and made a part
hereof.

COLLINS, GALLOWAY & MURPHY

BY:


Wilson M. Hawkins, Jr.
ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:

Ella Sanspree
Box 698
Foley, Alabama

FILED

SEP 22 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

AFFIDAVIT TO CLAIM

Missouri, St. Louis Rev. Code, Sec. 1313.42
The State of ~~Ohio~~ ~~Missouri~~ County, ss. ~~Hamilton~~

Before me, a NOTARY PUBLIC in and for
said County, personally appeared C. W. Detert
who being duly sworn says that he is Financial Services Manager
of Monsanto Company
the owner of the ACCOUNT hereto attached, that said
ACCOUNT is correct, just and lawful, and the consid-
eration therefor was Merchandise
to said Ella Sanspree at the request of
Himself that no part of the same has been paid except as
stated thereon; that there are no counter claims against the same to the knowledge of the affiant,
except None

and that there is justly due the said Monsanto Co.
thereon the sum of Nine hundred and five and 60/100 ----- Dollars,

and that he hold security therefor

Sworn to before me and signed in my presence this 3rd day of August 1971

Charles W. Detert
Dorland Berg
Notary Public, St. Louis Missouri
County, Ohio
My Commission Expires Apr. 4, 1974

Monsanto

MONSANTO COMPANY
800 NORTH LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63166

STATEMENT

Ella Sanspree
P. O. Box 698
Foley, Alabama 36535

LEDGER NO.	MO.	DAY	YEAR
752170-204	08	23	71

IMPORTANT: IF PURCHASES AND PAYMENTS MADE NEAR THIS STATEMENT DATE ARE NOT REFLECTED, THEY WILL APPEAR ON THE NEXT MONTH'S STATEMENT. ANY DIFFERENCES SHOULD BE REPORTED PROMPTLY. ANY PAYMENTS ON THIS ACCOUNT SHOULD BE DIRECTED TO THE LOCK BOX SHOWN ON OUR INVOICES.

✓	DATE	REFERENCE	TRANS-ACTION	DEBITS	CREDITS	BALANCE
				850.00	470.45	
	02	68	301314	25.00		
	02	68	301315	120.33		
	05	68	181812	24.00		
	05	68	181831	172.00		
	05	68	181834	.50		
	03	68	301672	15.00		
	03	68	301677	110.00		
	03	68	301709	59.22		
			Finance Charges			905.60

FORM 271 REV. 2-69

* TRANSACTION CODE: 1 INVOICE - 2 DEBIT MEMO - 3 CREDIT MEMO - 4 CASH - 5 VOUCHER - 6 JOURNAL ENTRY - 7 BALANCE FORWARD

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A Corporation,

Plaintiff,

VS:

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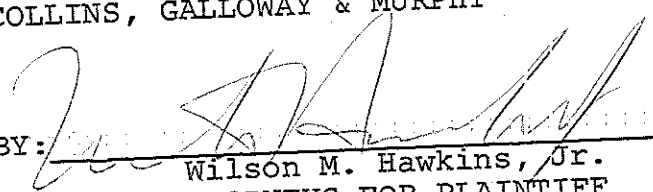
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COLLINS, GALLOWAY & MURPHY

BY: 

Wilson M. Hawkins, Jr.
ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:

Ella Sanspree
Box 698
Foley, Alabama

FILED

SEP 22 1971

EUNICE B. BLACKMON
CIRCUIT
CLERK

AFFIDAVIT TO CLAIM

Missouri, St. Louis

Rev. Code, Sec. 1313.42

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to said Ella Sanspree at the request of
Himself that no part of the same has been paid except as
stated thereon; that there are no counter claims against the same to the knowledge of the affiant,
except None

and that there is justly due the said Monsanto Co.
thereon the sum of Nine hundred and five and 60/100 -----Dollars,

and that he hold security therefor

Sworn to before me and signed in my presence this 23rd day of August 1971

Delores Berg
Notary Public, St. Louis Missouri County, Ohio

My Commission Expires Apr. 4, 1974

Monsanto

MONSANTO COMPANY
800 NORTH LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63166

STATEMENT

Ella Sanspree
P. O. Box 698
Foley, Alabama 36535

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Baldwin County

Circuit Court, Baldwin County

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....., Plaintiff.....

Witness my hand this.....22nd.....day of.....September.....19.71

Eunice B. Blackmon, Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MONSANTO COMPANY, A Corp.

Plaintiffs

vs.

ELLA SANSPREE, ABC, etc.

Defendants

SUMMONS AND COMPLAINT

Filed September 22, 1971

Eunice B. Blackmon Clerk

DEC 21 1971

TAYLOR SHERIFF

Collins, Galloway & Murphy
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

205 East Fig St.
Talleville, Ala.

Received In Office

December 21 1971

SEP 23 1971

Sheriff

I have executed this summons
SHERIFF

this 19

by leaving a copy with

Ella Sanspree

15 day of Oct 1971
Returned in my county after diligent search and
Sheriff claims
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF
Childress

Returned 6 day of Jan 1972
Not found in my county after diligent search and
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF
Childress

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924-1956)
ROBERT H. SMITH
WILSON M. HAWKINS, JR.

P. O. BOX 4492
TELEPHONE
432-0568
AREA CODE 205

September 21, 1971

10,036

Mrs. Eunice B. Blackmon
Clerk, Circuit Court
Baldwin County Court House
Bay Minette, Alabama

Re: Monsanto Company
Vs: Ella Sanspree, et al

Dear Mrs. Blackmon:

Please file the enclosed complaint in the above referenced matter and indicate that you have done so on the enclosed carbon copy of this letter. Please return this in the self-addressed, stamped envelope enclosed for your convenience.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY: _____

Wilson M. Hawkins, Jr.

WMHJr/jkl
Enclosures

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1924-1956)
ROBERT H. SMITH
WILSON M. HAWKINS, JR.

December 20, 1971

P. O. Box 4492
TELEPHONE
432-0568
AREA CODE 205

Mrs. Eunice B. Blackmon
Clerk, Circuit Court
Baldwin County Court House
Bay Minette, Alabama

Re: Monsanto Company
Vs: Ella Sanspree
Case No. 10,036

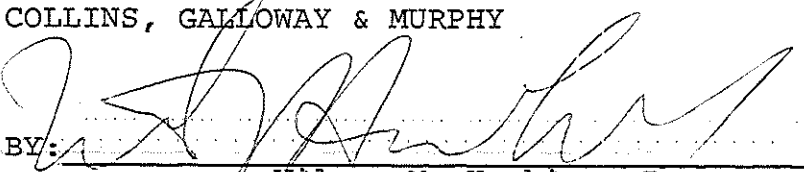
Dear Mrs. Blackmon:

Please issue an alias summons and complaint to the
defendant at her address of 205 East Fig Street, Foley, Alabama.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY: 

Wilson M. Hawkins, Jr.

WMHJr/jkl