

SELIG CHEMICAL INDUSTRIES,
a corporation,

Plaintiff,

vs.

JAMES TAYLOR, individually and
doing business as TAYLOR'S 66
SERVICE STATION,

Defendant

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

)

) CASE NO. 10,109

)

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY-SIX AND 83/100 DOLLARS (\$256.83) due him by account on, to-wit, the 3rd day of March, 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 TWO HUNDRED FIFTY-SIX AND 83/100 DOLLARS (\$256.83) due him by account on, to-wit, the 3rd day of March, 1970, which sum of money with the interest thereon is still unpaid.

COUNT III

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY-SIX AND 83/100 DOLLARS (\$256.83) due him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to-wit, the 3rd day of March, 1970, which sum of money with interest is still unpaid.


DANIEL A. BENTON, Attorney for Plaintiff

OF COUNSEL:

RICKARBY & BENTON
Fairhope, Alabama

Defendant may be served at
Box 13D, Highway 90
Robertsdale, Alabama

FILED

NOV 9 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

If an individual, omit paragraphs 2 and 3; if a co-partnership, omit paragraphs 1 and 3; if a corporation, omit paragraphs 1 and 2.

STATE OF GEORGIA
COUNTY OF FULTON

BEFORE ME, the undersigned authority, on this day personally appeared GAYLON E. RAMSEY
who, being by me duly sworn, states on oath that he is CONTROLLER (Name of person making affidavit)

1. An individual trading as _____
(Trade style if used — otherwise owner's name)

2. Agent of _____
(Name of firm)

a co-partnership, composed of _____
(Names of partners)

and that he is duly qualified and authorized to make this affidavit.

3. Agent of THE SELIG CHEMICAL INDS., a corporation,
(Name of corporation)

duly incorporated and existing under and by virtue of the laws of the State of GEORGIA,

with its principal office and domicile in the City of ATLANTA, County

of FULTON, and State of GEORGIA, and
is duly qualified and authorized to make this affidavit.

4. That the foregoing and annexed account, claim, and cause of action in favor of THE SELIG CHEMICAL INDS.,

P. O. BOX 43106 Atlanta, Georgia and against Taylor's 66

Service Sta., Ro bertsdale, Alabama

in the sum of Two hundred fifty six dollars and 83/100 Dollars
is within the knowledge of affiant just and true, and that it is due and that all just and lawful offsets, payments and
credits have been allowed.

SWORN TO AND SUBSCRIBED BEFORE ME, this 22nd day of October A. D. 19 71

(Notary Seal)

Gaylon E. Ramsey
Gaylon E. Ramsey, Controller

Eleanor S. Hutchinson
NOTARY PUBLIC IN AND FOR COUNTY OF

STATE OF _____

My Commission Expires _____

Notary Public, Georgia State at Large
My Commission Expires Feb. 24, 1973

FACTORY COPY

RECEIVED

FOR THE DIRECTOR OF THE BUREAU OF THE ARMY

1. NAME OF THE PERSON OR FIRM		2. ADDRESS		3. CITY		4. STATE		5. ZIP CODE	
6. TYPE OF BUSINESS		7. DATE OF ESTABLISHMENT		8. TYPE OF PRODUCT		9. QUANTITY PRODUCED		10. VALUE OF PRODUCT	
11. NAME OF THE PERSON OR FIRM		12. ADDRESS		13. CITY		14. STATE		15. ZIP CODE	
16. TYPE OF BUSINESS		17. DATE OF ESTABLISHMENT		18. TYPE OF PRODUCT		19. QUANTITY PRODUCED		20. VALUE OF PRODUCT	
21. NAME OF THE PERSON OR FIRM		22. ADDRESS		23. CITY		24. STATE		25. ZIP CODE	
26. TYPE OF BUSINESS		27. DATE OF ESTABLISHMENT		28. TYPE OF PRODUCT		29. QUANTITY PRODUCED		30. VALUE OF PRODUCT	
31. NAME OF THE PERSON OR FIRM		32. ADDRESS		33. CITY		34. STATE		35. ZIP CODE	
36. TYPE OF BUSINESS		37. DATE OF ESTABLISHMENT		38. TYPE OF PRODUCT		39. QUANTITY PRODUCED		40. VALUE OF PRODUCT	
41. NAME OF THE PERSON OR FIRM		42. ADDRESS		43. CITY		44. STATE		45. ZIP CODE	
46. TYPE OF BUSINESS		47. DATE OF ESTABLISHMENT		48. TYPE OF PRODUCT		49. QUANTITY PRODUCED		50. VALUE OF PRODUCT	
51. NAME OF THE PERSON OR FIRM		52. ADDRESS		53. CITY		54. STATE		55. ZIP CODE	
56. TYPE OF BUSINESS		57. DATE OF ESTABLISHMENT		58. TYPE OF PRODUCT		59. QUANTITY PRODUCED		60. VALUE OF PRODUCT	
61. NAME OF THE PERSON OR FIRM		62. ADDRESS		63. CITY		64. STATE		65. ZIP CODE	
66. TYPE OF BUSINESS		67. DATE OF ESTABLISHMENT		68. TYPE OF PRODUCT		69. QUANTITY PRODUCED		70. VALUE OF PRODUCT	
71. NAME OF THE PERSON OR FIRM		72. ADDRESS		73. CITY		74. STATE		75. ZIP CODE	
76. TYPE OF BUSINESS		77. DATE OF ESTABLISHMENT		78. TYPE OF PRODUCT		79. QUANTITY PRODUCED		80. VALUE OF PRODUCT	
81. NAME OF THE PERSON OR FIRM		82. ADDRESS		83. CITY		84. STATE		85. ZIP CODE	
86. TYPE OF BUSINESS		87. DATE OF ESTABLISHMENT		88. TYPE OF PRODUCT		89. QUANTITY PRODUCED		90. VALUE OF PRODUCT	
91. NAME OF THE PERSON OR FIRM		92. ADDRESS		93. CITY		94. STATE		95. ZIP CODE	
96. TYPE OF BUSINESS		97. DATE OF ESTABLISHMENT		98. TYPE OF PRODUCT		99. QUANTITY PRODUCED		100. VALUE OF PRODUCT	

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CUSTOMER STATEMENT



CHEMICAL INDUSTRIES

A DIVISION OF NATIONAL SERVICE INDUSTRIES, INC.

10-22-71

MANUFACTURERS OF INDUSTRIAL AND INSTITUTIONAL
MAINTENANCE AND PROCESS CHEMICALS

Taylor 66 Service Sta.,
Truck Rep. Route 1
Box 130
Robertsdale, Alabama

OFFICE - PLANTS
IN PRINCIPAL CITIES

CUSTOMER NUMBER	BRANCH CODE	STATEMENT DATE	SALESMAN NO.	CURRENT BALANCE
09632	400	October 22, 1971	055	

TO ASSURE PROMPT AND PROPER CREDIT, PLEASE DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT.

PREVIOUS BALANCE →

ACTIVITY DATE	REFERENCE NUMBER	REFERENCE DESCRIPTION	CURRENT CHARGES	CURRENT CREDITS
3-3-70	13500		256.83	

Transactions subsequent to statement date will appear on your next statement.

SELIG CHEMICAL INDUSTRIES

Thank you for
your patronage.

amco tabs & ivan allen

FORM NO. SDC-100 (1-70)

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,109

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonJAMES TAYLOR, individually and dba.....
.....TAYLOR'S 66 SERVICE STATION.....

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...JAMES TAYLOR,
.....individually and dba TAYLOR'S 66 SERVICE STATION....., Defendant.....

bySELIG CHEMICAL INDUSTRIES, a corporation.....
....., Plaintiff.....

Witness my hand this.....9.....day of.....Nov.....1971

.....Eunice B. Blackmon.....Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

GELIC CHEMICAL INDUSTRIES,

a corporation,

Plaintiffs

vs.

JAMES TAYLOR, individually &
dba TAYLOR'S 66 SERVICE
STATION Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

NOV 9 1971

EUNICE B. BLACKMON CIRCUIT CLERK

RICKARBY & BENTON
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Box 13D, Highway 90
Robertsdale, Alabama.....

Received In Office

November 9..... 1971

Sheriff

I have executed this summons

this 11-27..... 1971

by leaving a copy with

James Taylor
Alba Taylor's
66 Service Station

Process Clerk 120 Entries

Ten Cents per mile Total \$ 12.00

TAYLOR, WILKINS, Sheriff

Deputy Sheriff

NOV 9 1971

Taylor Wilkins Sheriff

H. Brown Deputy Sheriff

601 R T
S. Dal

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

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 12, 1972

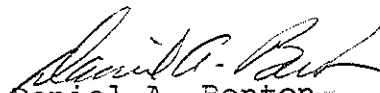
Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: Selig Chemical Industries
v. James Taylor,
Case No. 10,109

Dear Judge Mashburn:

We request judgment by default in the above styled matter for \$285.08, which includes \$256.83 principal and \$28.25 interest from the 3rd day of March, 1970. This case is submitted on the original complaint and itemized and verified statement of account, and personal service was obtained on the defendant on the 27th day of November, 1971.

Respectfully submitted,


Daniel A. Benton

DAB:w

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

November 8, 1971

Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Re: Selig Chemical Industries
v. James Taylor, dba
Taylor's Service Station

Dear Mrs. Blackmon:

Enclosed is summons and complaint in the above-styled matter.
Please process.

Thank you.

Yours very truly,


Daniel A. Benton

DAB:w
Enc.

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

November 8, 1971


Mrs. Eunice B. Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

Dear Mrs. Blackmon:

Please file the enclosed complaint, appoint
a guardian ad litem and let me know who is acting.
We are trying to get this case brought to a prompt
conclusion.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/mm
Enc.