

SWIFT AGRICULTURAL CHEMICALS CORPORATION,
a corporation,

Plaintiff

vs.

RONALD L. GUNNISON,

Defendant

* IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

* AT LAW

CASE NO. 10,385'

*

COMPLAINT

Plaintiff claims of the Defendant the sum of FOUR HUNDRED
TWENTY SIX AND 82/100 (\$426.82) DOLLARS due from him by account on, to-wit,
the 20th day of November, 1970, which sum of money, with the interest thereon
is still due and unpaid.

This suit is filed on an itemized verified account, which will
be entered into evidence at the trial of this cause.

GALLALEE, DENNISTON & EDINGTON

BY: 

I. DAVID CHERNIAK
Attorney for Plaintiff

Defendant may be served at

Route 1, Box 172
Fairhope, Alabama 36532

FILED

MAY 11 1972

ELNICE B. BLACKMON CIRCUIT
CLERK

ANY QUESTIONS REGARDING YOUR STATEMENT SHOULD BE DIRECTED TO THE MAIL TO ADDRESS.

MAKE CHECKS PAYABLE TO SWIFT AGRICULTURAL CHEMICALS CORPORATION

SOLD TO:

RONALD L GUNNISON SR
P O BOX 171 ROUTE 1
FAIRHOPE ALA 36532

MAIL CHECK TO:

SWIFT CHEMICAL
P O BOX 11388
MONTGOMERY, ALABAMA 36111

PAYMENTS RECEIVED AFTER BILLING DATE WILL BE CREDITED THE FOLLOWING MONTH.

CUSTOMER NO. 0855494	SALES-MAN NO. 310	OUTLET NO. 252	PAGE NO. 1	AMOUNT OF PAYMENT
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BILLING DATE NOV 20, 1970

TO ENSURE PROPER CREDIT RETURN THIS STUB WITH YOUR REMITTANCE

NET DATE	INVOICES AND CHARGES		† CODE	PAYMENTS AND CREDITS	
	NUMBER AND DATE	AMOUNT		AMOUNT	NUMBER AND DATE
11/20/70		17.59	* FC		
7/20/69	0444245 05/28/69	405.00	* PRV		
12/20/70		4.23	* FC		

USING THIS BALANCE	
TOTAL OF ALL INVOICES NOT PAID BY NET DATE	422.59
WE ADDED A PERIODIC RATE OF 1.00 % PER MONTH.	4.23
TOTAL FINANCE CHARGES	4.23

To Your PREVIOUS BALANCE	422.59
We Added CURRENT PURCHASES AND CHARGES	
We Deducted PAYMENTS CREDITS	

FINANCE CHARGES AT AN ANNUAL PERCENTAGE RATE OF 12.00% = 4.23

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THIS AMOUNT * 426.82 IS DUE BY DEC 20, 1970 TO AVOID FURTHER FINANCE CHARGE

THIS IS YOUR NEW BALANCE 426.82

† CODES: CUR - Current month charge
PRV - Previous month charge
UC - Unapplied credit will be applied next statement
NT - Balance transferred to note
FC - Finance charge
CR - Credit memo
AJ - Misc. adjustment

BILLING DATE
NOV 20, 1970

SWIFT AGRICULTURAL CHEMICALS CORPORATION

THANK YOU

P O BOX 11388
MONTGOMERY, AL. AMA 36111

UJARCO BUSINESS FORMS - CHICAGO

Mobil Chemical Company

invoice 3

AGRICULTURAL CHEMICALS DIVISION

SALES OFFICE: *Montgomery Ala*

No. **444245**

INV. NO. REF'D	T	INVOICE DATE	ORDER DATE	DATE SHIPPED	SHIPPED FROM	CODE	FRT. CODE	CARR. CODE	TYPE
		<i>5-28-69</i>		<i>3-19-69</i>		<i>237</i>	<i>3</i>	<i>1</i>	<i>1</i>
SALES OFFICE	CUSTOMER NO.	TERRITORY NO.	COUNTY	STATE	CUST. ORDER NO.	PROD GRP.	TERMS	CODE	
<i>252</i>	<i>0855494</i>	<i>354</i>	<i>003</i>	<i>01</i>		<i>14</i>		<i>5-69</i>	

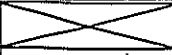
CUSTOMER

*Ronald Gunnison
Rt. 1 Box 172
Fairhope, Alabama*

SHIP TO

LINE NO.	PACKAGE			QUANTITY	UNIT PRICE	F	PRODUCT CODE	FORMULA CODE	DESCRIPTION	ANALYSIS			AMOUNT
	NUMBER	SIZE	CODE							NIT.	A.P.A.	POT.	
<i>1</i>	<i>000100</i>	<i>PA</i>	<i>273</i>	<i>10,000</i>	<i>40.50</i>		<i>N10835</i>	<i>02</i>	<i>Regular</i>	<i>4</i>	<i>12</i>	<i>12</i>	<i>405.00</i>
<i>2</i>													
<i>3</i>													
<i>4</i>													

<i>39928</i>

LINE REF.	ID CODE	EXPLANATION
		

X	NT	NET QUAN.	<i>10,000</i>	NET \$			<i>405.00</i>
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FREIGHT CODES: 1-COLLECT CARRIER CODES: 1-CUSTOMER VEHICLE
 2-PREPAID 2-MOBIL VEHICLE - MFG.
 3-PICKUP 3-MOBIL VEHICLE - SALES
 4-CONTRACT VEHICLE - TRUCK OR SPREADER
 5-CONTRACT VEHICLE - RAIL

CODED BY: <i>EC</i>	<input checked="" type="checkbox"/> FS	FRT. & SPREADING COST	<input checked="" type="checkbox"/> HP	HOP TRANS. NO.
---------------------	----------------------------------------	-----------------------	----------------------------------------	----------------

		INVOICE TOTAL
--	---------------------------------------------------------------------------------------	----------------------

The undersigned carrier and/or his duly authorized Driver and Agent, agrees to deliver, promptly and safely, these goods to the consignee at the destination shown, and agrees to assume liability for all hazards incidental to said delivery, and hereby certifies that he has checked and verified the count of bags as set forth above.

It is expressly agreed between the company and the purchaser that the fertilizer or fertilizer materials specified above are delivered by the company and accepted by the purchaser with the guaranty or analysis only, and not with any guaranty of any results from their use.

VIA	TRUCK LICENSE OR R.R. CAR NO.	DRIVER'S NAME	ARRIVAL TIME	TIME LOADED
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SHIPPING CLERK	OFFICE CLERK	SIGNATURE OF DRIVER	SIGNATURE OF CUSTOMER
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3

FORM NO. 50 247-H

SALES OFFICE COPY

AFFIDAVIT

STATE OF ILLINOIS

COUNTY OF COOK

Before me, _____, a

Notary Public _____, in and for said _____ County

in said State, personally appeared G. E. GISLER,

who having been first duly sworn, deposes and says that he is

Credit Manager of Swift Agricultural

Chemicals Corporation,

the Claimant, and that he has full and complete knowledge of the

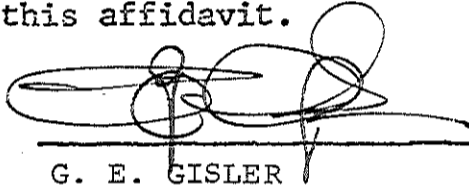
account against Ronald L. Gunnison, Sr.,

and that the foregoing itemized statement of the said account that

is attached hereto showing the amount justly due, \$426.82,

is true and correct after allowing all proper credits, and that

he is duly authorized to make this affidavit.



G. E. GISLER

Subscribed and sworn to before me

this the 5th day of April,

1967.



(Title of Officer)

MY COMMISSION EXPIRES NOVEMBER 17, 1973

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,385

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon Ronald L. Gunnison

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.....

Ronald L. Gunnison

Defendant.....

by Swift Agricultural Chemicals Corp. a corp.

Plaintiff.....

witness my hand this 11th day of May 1972

Eunice B. Blackman Clerk

uc

No. 10,385

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

SWIFT AGRICULTURAL CHEMICALS CORP.
A CORP.
Plaintiffs

VS.

RONALD L. GUNNISON
Defendants

SUMMONS AND COMPLAINT

Filed May 11, 1972

Eunice B. Blackmon Clerk

MAY 12 1972

TAYLOR WILKINS
SHERIFF

Gallalee, Denniston & Edington
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

MAY 12 1972 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this 13 May 1972

by leaving a copy with

Ronald L. Gunnison

Sheriff claim 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

W. Crook

DEPUTY SHERIFF

W. Crook Sheriff

W. Crook Deputy Sheriff

SWIFT AGRICULTURAL CHEMICAL CORPORATION,
A Corporation,

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vs.

RONALD L. GUNNISON,

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* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

* AT LAW

* CASE NO. 10385

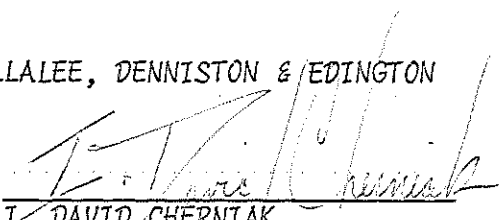
MOTION FOR DEFAULT JUDGMENT

Comes now the Plaintiff in the above styled cause and shows unto the Court that heretofore and more than thirty (30) days ago, on, to-wit, the 13th day of May, 1972 the Defendant in the above styled cause was served with summons and complaint herein. More than thirty (30) days has elapsed and the Defendant has failed to appear herein.

WHEREFORE, the premises considered the Plaintiff respectfully prays that this Court will enter a judgment by default in favor of the Plaintiff and against the Defendant in this cause.

GALLALEE, DENNISTON & EDINGTON

BY:


J. DAVID CHERNIAK
Attorneys for Plaintiff

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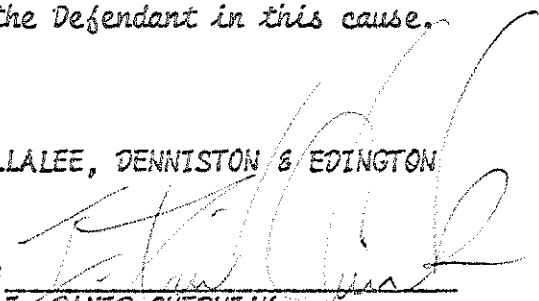
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BY:


I. DAVID CHERNIAK

Attorneys for Plaintiff

SWIFT AGRICULTURAL CHEMICAL CORP.

Complainant.

VS.
RONALD L. GUNNISON

Defendant.

IN THE CIRCUIT COURT

OF

~~MOBILE~~ BALDWIN COUNTY, ALABAMA.

NO. 10,385

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA }
COUNTY OF MOBILE }

NOW comes, I. David Cherniak

who being first duly sworn, deposes and says that the defendant herein, Ronald
L. Gunnison

was not at the time of the filing of this suit, and is not now in the Military or Naval Service of the United States.

The Defendant resides at Route 1, Box 172, Fairhope, Alabama 36532

I. DAVID CHERNIAK

Sworn to and subscribed before me,

this 12 day of July

1972

William P. Delaney
NOTARY PUBLIC, MOBILE COUNTY, ALA.

Term Expires 10/13/75

FILED

REGISTER

LAW OFFICES
GALLALEE, DENNISTON & EDINGTON
50 ST. EMANUEL STREET
MOBILE, ALABAMA
36602

JACK C. GALLALEE
ROBERT P. DENNISTON
ROBERT S. EDINGTON
I. DAVID CHERNIAK
FREDERICK G. HELMSING
HORACE MOON, JR.
WILLIAM R. DELANEY
J. DON FOSTER

WILLIAM G. CAFFEY (1884-1964)
TELEPHONE 438-6132
AREA CODE 205

July 12, 1972

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

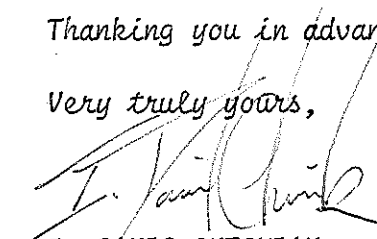
Re: *Swift Agricultural Chemicals vs. Gunnison*
Case No. 10385

Dear Mrs. Blackmon:

Enclosed herewith is a motion for default judgment along with a non-military affidavit. We would very much appreciate your bringing this matter to the attention of the Court at the appropriate time so that a default judgment may be entered in favor of our client. Judgment should be for \$426.82 of principal, interest in the amount of \$41.00 through the 12th day of July, 1972 and costs.

Thanking you in advance for your cooperation, I remain,

Very truly yours,


I. DAVID CHERNIAK
For the Firm

IDC/swh

Enclosures

SWIFT AGRICULTURAL CHEMICALS CORPORATION,
a corporation,

Plaintiff

vs.

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Defendant

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