

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
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MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
BENJAMIN T. ROWE
G. L. LEATHERBURY, JR.
WILLIAM C. ROEDDER, JR.

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

August 16, 1974

Clerk, Circuit Court of
Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

*issued
8.26.74*

Re: Edward J. Phelan, et al., vs.
Massey-Ferguson, et al.,
Docket No. L-20573-72 of Superior
Court of New Jersey, Law Division,
Mercer County

Dear Madam:

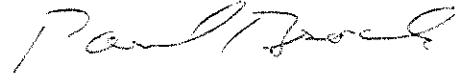
Enclosed is a copy of the notice to take the oral deposition of Mr. Robert Jenkins, 110 Fairwood Boulevard, Fairhope, Alabama, on Thursday, August 29, 1974, and the affidavit of Cathy A. Ver Sprill, sworn to August 14, 1974, to the effect that this notice was sent by certified mail to Messrs. Hartmann and Kriegel, opposing counsel in the above case, by Mr. John Ridley, counsel for the defendant. Also enclosed is a copy of his letter of August 14 to them in which he enclosed said notice.

I ask that, pursuant to Rule 28 (b) of the Alabama Rules of Civil Procedure, you issue a subpoena to Mr. Jenkins, at the address above described, directing him to bring with him and to produce at said deposition the material described in numbered paragraphs I through V, inclusive, of the notice. The subpoena should require Mr. Jenkins to appear at 9:00 a.m. on Thursday, August 29, 1974, at the office of Hand, Arendall, Bedsole, Greaves and Johnston, 30th Floor, First National Bank Building, Mobile.

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Baldwin County
August 16, 1974
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Thank you for your help.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Paul T. Brock".

For the Firm

PWB.bs

cc: J. Connor Owens, Esq.
John A. Ridley, Esq.