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WESLEY PIPES

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P. O. DRAWER 2525

August 20, 1968

Mrs. Alice Duck, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama

Re: Robinson v. Indurall Coatings, Inc.

Dear Mrs. Duck:

Enclosed herewith is Plea in Abatement which we ask
that you file in the case of Robinson v. Indurall
Coatings, Inc., Case No. 8228.

Will you please stamp the enclosed copy of this
letter and return same to us for our file.

Very truly yours,

LYONS, PIPES AND COOK

Sam W. Pipes

SWP:ikth

cc: Mr. Norborne Stone
Attorney at Law
Bay Minette, Alabama

Mr. Bryant A. Whitmire
Attorney at Law
903 City Federal Building
Birmingham, Alabama 35203

FILED IN OFFICE

JAN 16 1969

JULIAN SWIEI
CLERK

22850

STATE OF ALABAMA

BALDWIN COUNTY

ODELL, ROBINSON,

Plaintiff

vs:

INDURALL COATINGS, Inc.

Defendant

Case No. 8228

I, Julian Swiei Clerk of the Circuit Court of Jefferson
County, Alabama, do hereby certify that I have this 16 day of Jan
 , 1969, Received the transcript in the above styled
cause, transferred from the Circuit Court of Baldwin County, Alabama.

Julian Swiei
Clerk of the Circuit Court
of Jefferson County, Alabama.

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON

January 10, 1969

TELEPHONE 937-2191

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Robinson vs. Indurall
Coatings, Inc.
Case No. 8228

This firm represents the Plaintiff in the above case and Mr. Wesley Pipes has filed a plea in abatement on behalf of the Defendant in and by the terms of which he objects to the venue of this court.

Under the law of Alabama, Mr. Pipes is correct in his position and an order should be entered by Judge Mashburn transferring this case to the Circuit Court of Jefferson County, Alabama.

Would you please ask Judge Mashburn to enter such order and when he has done so notify this writer so that we can arrange to have counsel represent Mr. Robinson in Jefferson County.

Your attention to this request will be sincerely appreciated.

Yours very truly,

CHASON, STONE & CHASON

By: 

NCS:pjb
cc: Honorable Wesley Pipes
cc: Honorable Bryant A. Whitmire