

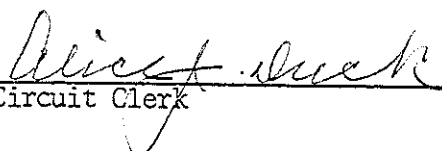
STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons L. G. Borkin, to be and appear within thirty days from the date of service hereof in the Circuit Court of Baldwin County, Alabama, and plead, answer or demur to the Complaint of Kerr McGee Chemical Corporation, a Corporation.

Witness my hand this 24 day of March, 1970.


Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

L. G. BORKIN,

Defendant

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

AT LAW

COUNT I.

The Plaintiff claims of the Defendant the sum of Eleven Thousand, Eight Hundred, Fifty Eight Dollars and sixty six cents (\$11,858.66), due by promissory note made by the Defendant on the 11th day of February, 1969, and payable on the 15th day of July, 1969, which sum of money, together with interest thereon, is due and unpaid.

COUNT II.

Plaintiff claims of the Defendant the sum of Five Thousand, Eight Hundred, Twenty Eight Dollars and thirteen cents (\$5,828.13), for goods, merchandise and chattels sold by the Plaintiff to the Defendant during the years of 1968 and 1969, which sum of money, with interest thereon is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the Defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable Attorney's fee and that such a reasonable fee is Three Thousand, and Five Hundred Dollars (\$3,500.00).

FILED


MAR 24 1970

ALICE J. DUCK

CLERK
REGISTER


Attorney for Plaintiff

I, Jackson W. Stokes, Attorney for Plaintiff, do hereby acknowledge myself as security for cost in this cause.


Attorney for Plaintiff

JACKSON W. STOKES
ATTORNEY AT LAW
P. O. BOX 356
ELBA, ALABAMA 36323

Defendant's Address:
Route One
Loxley, Alabama

9176

extra copy

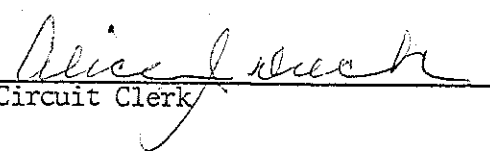
STATE OF ALABAMA

COUNTY OF BALDWIN

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Witness my hand this 24 day of March, 1970.


Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

L. G. BORKIN,

Defendant

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

COUNT I.

The Plaintiff claims of the Defendant the sum of Eleven Thousand, Eight Hundred, Fifty Eight Dollars and sixty six cents (\$11,858.66), due by promissory note made by the Defendant on the 11th day of February, 1969, and payable on the 15th day of July, 1969, which sum of money, together with interest thereon, is due and unpaid.

COUNT II.

Plaintiff claims of the Defendant the sum of Five Thousand, Eight Hundred, Twenty Eight Dollars and thirteen cents (\$5,828.13), for goods, merchandise and chattels sold by the Plaintiff to the Defendant during the years of 1968 and 1969, which sum of money, with interest thereon is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the Defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable Attorney's fee and that such a reasonable fee is Three Thousand, and Five Hundred Dollars (\$3,500.00).

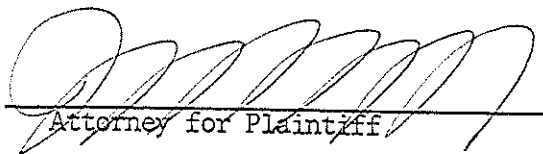
FILED

MAR 24 1970

ALICE I. SMITH
CLERK
REGISTER


Attorney for Plaintiff

I, Jackson W. Stokes, Attorney for Plaintiff, do hereby acknowledge
myself as security for cost in this cause.


Attorney for Plaintiff

JACKSON W. STOKES
ATTORNEY AT LAW
P. O. BOX 356
ELBA, ALABAMA 36323

Defendant's Address:
Route One
Loxley, Alabama

FILED

MAR 24 1970

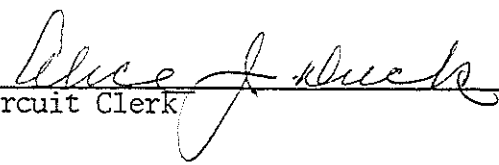
ALICE J. BUCK CLERK
REGISTER

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

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Witness my hand this 24 day of March, 1970.


Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

L. G. BORKIN,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

MS. 9176

COUNT I.

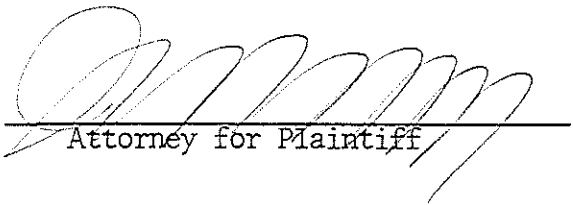
The Plaintiff claims of the Defendant the sum of Eleven Thousand, Eight Hundred, Fifty Eight Dollars and sixty six cents (\$11,858.66), due by promissory note made by the Defendant on the 11th day of February, 1969, and payable on the 15th day of July, 1969, which sum of money, together with interest thereon, is due and unpaid.

COUNT II.

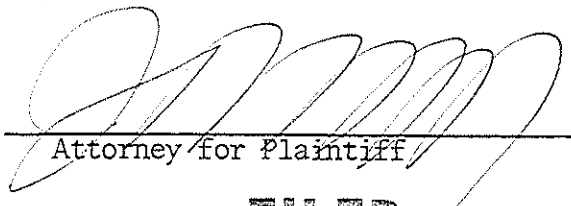
Plaintiff claims of the Defendant the sum of Five Thousand, Eight Hundred, Twenty Eight Dollars and thirteen cents (\$5,828.13), for goods, merchandise and chattels sold by the Plaintiff to the Defendant during the years of 1968 and 1969, which sum of money, with interest thereon is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the Defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable Attorney's fee and that such a reasonable fee is Three Thousand, and Five Hundred Dollars (\$3,500.00).


Attorney for Plaintiff

I, Jackson W. Stokes, Attorney for Plaintiff, do hereby acknowledge myself as security for cost in this cause.


Attorney for Plaintiff

FILED

MAR 24 1970

ALICE J. DUCK CLERK
REGISTER

JACKSON W. STOKES
ATTORNEY AT LAW
P. O. BOX 356
ELBA, ALABAMA 36323

Defendant's Address:
Route One
Loxley, Alabama

3-31-70

PERSON NAMED HEREIN NOT
FOUND IN THIS COUNTY
Taylor Wilkins, Sheriff
By J.M. Byrd

Received 24 day of MARCH 19 70
and on _____ day of _____ 19 ____
it served a copy of the within DEC
on L.H. Barker & Co.
By service on _____

TAYLOR WILKINS, Sheriff
By _____ D. 90

ALICE J. DUCK CLERK
REGISTER

FILED

MAR 24 1970

Jackson W. Barker

9174
Kerr. Mc Gee Chemical Co.
a corp.
VS.
L. B. Barker
Sotly

JACKSON W. STOKES

ATTORNEY AT LAW

April 10, 1970

TELEPHONE
AREA CODE 205
897-2894

POST OFFICE BOX 356
ELBA, ALABAMA 36323

9174

Mrs. Alice J. Duck
Circuit Clerk
County Courthouse
Bayminette, Alabama

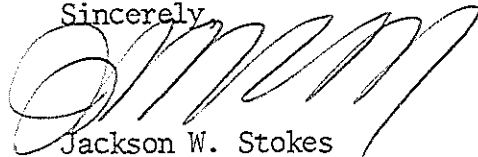
Re: Kerr McGee vs. Boykin

Dear Mrs. Duck:

Please dismiss the complaint previously forwarded to you styled Kerr McGee Chemical Corporation vs. Borkin, and send us a cost bill on same. I am enclosing another complaint properly styled. Please file same and advise when service has been perfected.

Thanking you and with my regards, I am,

Sincerely,



Jackson W. Stokes

JWS/jp