

KERR MCGEE CHEMICAL X
CORPORATION, a X
Corporation, X IN THE CIRCUIT COURT OF

Plaintiff, X BALDWIN COUNTY, ALABAMA

vs. X AT LAW

KERMITT FLOWERS, X CASE NO. 9179

Defendant X

Comes now the Defendant in the above styled cause and demurrers to the Plaintiff's Complaint, and for grounds thereof, says:

1.

That it does not state a cause of action.

2.

It fails to allege what goods, merchandise and chattels were sold by the Plaintiff to the Defendant.

3.

It fails to allege the date the goods, merchandise or chattels were sold to the Defendant.

WILTERS & BRANTLEY

BY: *Harry J. Wilters*
Attorneys for the Defendant

Defendant demands a trial by jury.

Harry J. Wilters

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12 day of May 1970 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By: *Harry J. Wilters*

FILED

MAY 12 1970

ALICE J. DUCK CLERK
REGISTER

May

9179

FILED

MAY 12 1970

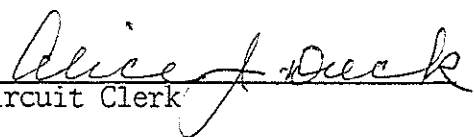
ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Kermitt Flowers, 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

KERMITT FLOWERS,

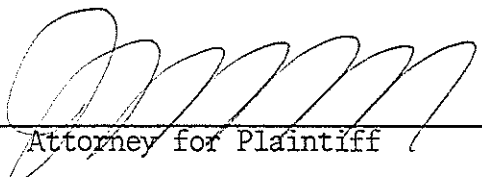
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

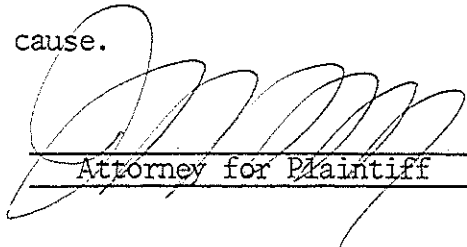
AT LAW

NO. 9179

Plaintiff claims of the Defendant the sum of Two Thousand, Two Hundred, twenty seven Dollars and eighty three cents (\$2,227.83), 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.


Attorney for Plaintiff

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


Attorney for Plaintiff

Plaintiff's Attorney:
Jackson W. Stokes
Attorney at Law
P. O. Box 356
Elba, Alabama 36323

Defendant's Address:
Foley, Alabama

FILED

MAR 24 1970

ALICE J. DUCK CLERK
REGISTER

no. 9149

Herr. McGee Chemical Corp
a corp

VS

Hermitt Flowers

FILED

MAR 24 1970

ALICE J. DUCK CLERK
REGISTER

Jackson W. Stoker

Received 24 day of March 1970

and on 15 day of April 1970

I served a copy of the within of

on Hermitt Flowers

By service on

TAYLOR WILKINS, Sheriff

Charles Brown D.

Sheriff claims 50 miles or

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Charles Brown

DEPUTY SHERIFF

JACKSON W. STOKES

ATTORNEY AT LAW

March 23, 1970

TELEPHONE
AREA CODE 205
897-2894

POST OFFICE BOX 356
ELBA, ALABAMA 36323

Mrs. Alcie Duck
Circuit Clerk
County Courthouse
Bayminette, Alabama

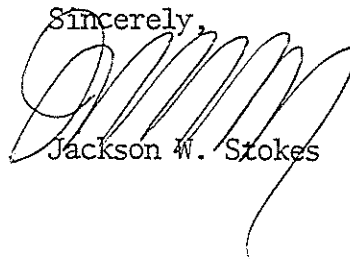
Re: Kerr McGee Accounts

Dear Mrs. Duck:

Please file the enclosed complaints and advise when service has been perfected.

Thanking you and with my regards, I am,

Sincerely,



Jackson W. Stokes

JWS/jp

FILED

MAR 24 1970

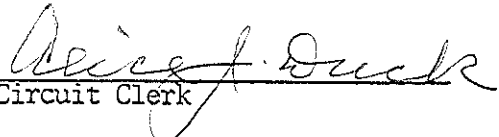
ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA
COUNTY OF BALDWIN

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Circuit Clerk

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A Corporation,

Plaintiff

VS

KERRITT FLOWERS,

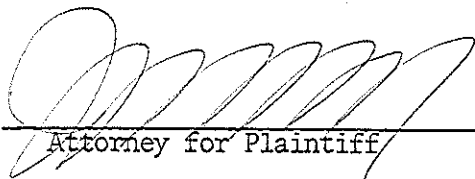
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

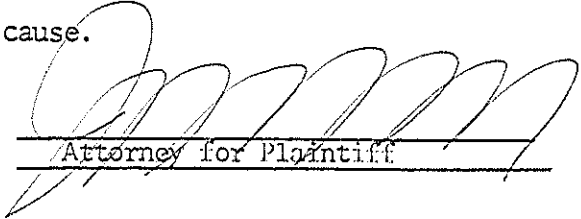
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Mo-9179

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Attorney for Plaintiff

Plaintiff's Attorney:
Jackson W. Stokes
Attorney at Law
P. O. Box 356
Elba, Alabama 36323

Defendant's Address:
Foley, Alabama

FILED

MAR 24 1970

ALICE J. DUCK CLERK
REGISTER

no. 9178

after 4/17