

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

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

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. D. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
THOMAS GUY GREAVES, III

April 17, 1970

Mrs. Alice J. Duck
Circuit Clerk and Register
Baldwin County, Alabama
Bay Minette, Alabama

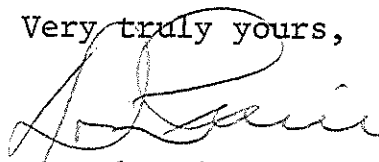
Re: Mrs. M. O. Ward, d/b/a Gulf Shores
Gift Shoppe vs. Sullivan, Long &
Hagerty, a corporation, et al.

Dear Mrs. Duck:

Please file this complaint for me. You will notice
that the defendant can be served at 801 Fifth Avenue,
North, or P. O. Box 2030, Birmingham, Alabama.

With best regards,

Very truly yours,


For the Firm

DFP/dm
Encl.

cc: Mrs. M. O. Ward
Mr. Claude O'Connor

no. 9228

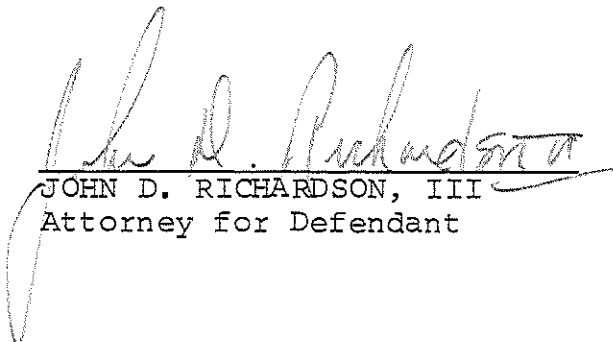
MRS. M. O. WARD d/b/a	:	IN THE CIRCUIT COURT
GULF SHORES GIFT SHOPPE,	:	
Plaintiff,	:	OF BALDWIN COUNTY,
	:	ALABAMA
VS.	:	
	:	AT LAW
SULLIVAN, LONG & HAGERTY,	:	
a corporation, et al,	:	
Defendants.	:	CASE NO. 9220

MOTION TO PRODUCE

Comes now the Defendant, SULLIVAN, LONG & HAGERTY, in the above styled cause, by and through its Attorney, JOHN D. RICHARDSON, III and moves the Court to compel, by order, the Plaintiff to produce and permit the said Defendant to inspect and to copy the following papers, or documents in possession or power of the Plaintiff which are necessary and material to the trial of said cause and contain evidence pertinent to the issues of said trial, to-wit:

1. The sales tax returns or receipts filed by the Plaintiff or her agent, if any, or a true and correct copy thereof for the years 1968, 1969 and 1970 showing her sales for said years.

STATE OF ALABAMA)
COUNTY OF MOBILE)

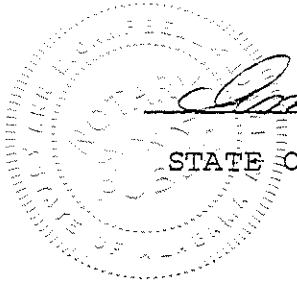

JOHN D. RICHARDSON, III
Attorney for Defendant

Before me, the undersigned authority, personally appeared JOHN D. RICHARDSON, III known to me, who being sworn deposes and says that he is the Attorney for the Defendant, SULLIVAN, LONG & HAGERTY in the foregoing cause, and as such, has knowledge of the facts set out in the foregoing motion; that the documents therein described contain evidence pertinent to the issues in this cause and that they are necessary and material to a proper disposition of the cause.


JOHN D. RICHARDSON, III

SWORN TO and SUBSCRIBED before me

this 17th day of September, 1971.



Clara E. Campbell
NOTARY PUBLIC
STATE OF ALABAMA AT LARGE

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17th day of September, 1971, 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.

John D. Richardson III
JOHN D. RICHARDSON, III

FILED

SEP 20 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

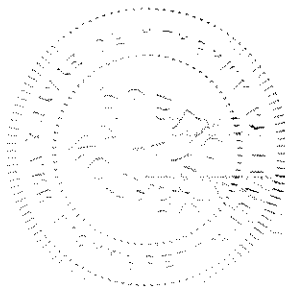
Turn

0229

[illegible]

The reaction scheme shows the conversion of compound 9 to compound 10. Compound 9 is a hexachloro-substituted tetrahydrophthalazine derivative. It reacts with compound 11, which is a hexachloro-substituted tetrahydrophthalazine derivative, to form compound 10, which is a hexachloro-substituted tetrahydrophthalazine derivative. The reaction is catalyzed by SnCl_4 and H_2SO_4 in CH_2Cl_2 at 0°C for 24 hours. The yield is 100%.

CONFIDENTIAL - EYES ONLY



Chemical structures of 1,2,3,4,5,6-hexachlorocyclohexane (C₆H₆Cl₆) isomers. The top row shows three chair conformations of the trans isomer, labeled 1, 2, and 3. The bottom row shows three chair conformations of the cis isomer, labeled 4, 5, and 6. Each structure is a cyclohexane ring with six chlorine atoms attached at the 1, 2, 3, 4, 5, and 6 positions. The trans isomers have alternating axial and equatorial chlorine atoms, while the cis isomers have all axial or all equatorial chlorine atoms at adjacent positions.

The diagram illustrates a quantum circuit for a 2-qubit system. It begins with two qubits, q_1 and q_2 , both initialized to the $|0\rangle$ state. Qubit q_1 is first processed by a Hadamard (H) gate. Both qubits then enter a CNOT gate, where q_1 acts as the control and q_2 as the target. Following the CNOT operation, qubit q_2 passes through another Hadamard (H) gate. The circuit concludes with a measurement operation on the qubits, which produces a classical bit output.

$$\begin{aligned} \frac{\partial^2 \mathcal{L}}{\partial \alpha^2} &= \frac{1}{2} \frac{\partial^2}{\partial \alpha^2} \left(\frac{1}{\alpha} \right) = -\frac{1}{2\alpha^3} \\ \frac{\partial^2 \mathcal{L}}{\partial \alpha \partial \beta} &= \frac{1}{2} \frac{\partial^2}{\partial \alpha \partial \beta} \left(\frac{1}{\alpha} \right) = 0 \\ \frac{\partial^2 \mathcal{L}}{\partial \beta^2} &= \frac{1}{2} \frac{\partial^2}{\partial \beta^2} \left(\frac{1}{\alpha} \right) = 0 \end{aligned}$$

MRS. M. O. WARD, d/b/a
GULF SHORES GIFT SHOPPE,

Plaintiff,

vs.

SULLIVAN, LONG & HAGERTY,
a corporation, SULLIVAN,
LONG & HAGERTY, a co-
partnership, X, an agent,
servant or employee of the
firm known as SULLIVAN, LONG
& HAGERTY, general contractors,
XYZ, a corporation, and AB&C
a co-partnership doing business
as SULLIVAN, LONG & HAGERTY,
jointly and severally,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER 9220

MOTION TO STRIKE

Comes now the Defendant, Sullivan, Long and Hagerty, a corporation,
Sullivan, Long and Hagerty, a co-partnership, and moves this Honorable
Court for an order striking from the caption of the above styled case
the fictitious parties named in said caption and for the following
reasons for said Motion saith as follows:

1. Fictitious parties named in the caption of said Complaint
do not comply with the statutory requirements of Title 7, Sec. 120,
Code of Ala. (Recomp. 1958), which reads as follows:

"When the Plaintiff is ignorant of the name of the
Defendant, he must state that fact in the Complaint,
and such Defendant may be designated in any pleading
or proceeding by any name, and when his true name is
discovered, the pleading or proceeding must be amended
accordingly, either before or after service of the
summons." (emphasis supplied)

WHEREFORE, the Defendant moves this Honorable Court to strike
those parties named as fictitious entities from the caption of the
Complaint.

FOREMAN, BROWN AND HUDGENS
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16th
day of June, 19 70, 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.

By John D. Richardson, III
Trial Counsel

FILED

JUN 17 1970

ALICE J. DUCK CLERK
REGISTER

Case 9228

Wm. M. D. Ward & Co

Les
Bullerian, Song's Sparrow
et al.

10. *Journal of the American Statistical Association*, 1997, 92, 1023-1032.

[illegible]

100-443886-100

$2^{10} = 1024$, $2^{20} = 1048576$, $2^{30} = 1073741824$, $2^{40} = 1099551423616$, $2^{50} = 1125899906842624$, $2^{60} = 1152921504606846976$, $2^{70} = 118059162071741130368$, $2^{80} = 12089258195176011549056$, $2^{90} = 1237941602958412789614656$, $2^{100} = 126765364287316979200000000$, $2^{110} = 12979526430359719972774400000$, $2^{120} = 1328945654241966744076160000000$, $2^{130} = 13606469509394561272750900000000$, $2^{140} = 139307344020096146430080000000000$, $2^{150} = 1426240195290924660991400000000000$, $2^{160} = 146016390454273174664550400000000000$, $2^{170} = 14948612737252976562500000000000000$, $2^{180} = 1530250063809619296896000000000000000$, $2^{190} = 15663488747169767680000000000000000000$, $2^{200} = 1603178431456205216000000000000000000000$, $2^{210} = 16407697376514192704000000000000000000000$, $2^{220} = 167914488372016053760000000000000000000000$, $2^{230} = 1718316979843148800000000000000000000000000$, $2^{240} = 17583092167684608000000000000000000000000000$, $2^{250} = 179914688372016053760000000000000000000000000$, $2^{260} = 1840855216768460800000000000000000000000000000$, $2^{270} = 18834597376514192704000000000000000000000000000$, $2^{280} = 192698602958412789614656000000000000000000000000$, $2^{290} = 1971459737651419270400000000000000000000000000000$, $2^{300} = 20168964314562052160000000000000000000000000000000$, $2^{310} = 206332273765141927040000000000000000000000000000000$, $2^{320} = 2110765216768460800000000000000000000000000000000000$, $2^{330} = 21592497376514192704000000000000000000000000000000000$, $2^{340} = 220880202958412789614656000000000000000000000000000000$, $2^{350} = 2259448837651419270400000000000000000000000000000000000$, $2^{360} = 23112152167684608000000000000000000000000000000000000000$, $2^{370} = 236412773765141927040000000000000000000000000000000000000$, $2^{380} = 2418212029584127896146560000000000000000000000000000000000$, $2^{390} = 24734952167684608000000000000000000000000000000000000000000$, $2^{400} = 252999483765141927040000000000000000000000000000000000000000$, $2^{410} = 2587737737651419270400000000000000000000000000000000000000000$, $2^{420} = 26467510295841278961465600000000000000000000000000000000000000$, $2^{430} = 270706283765141927040000000000000000000000000000000000000000000$, $2^{440} = 2768699737651419270400000000000000000000000000000000000000000000$, $2^{450} = 28316888376514192704000000000000000000000000000000000000000000000$, $2^{460} = 289605702958412789614656000000000000000000000000000000000000000000$, $2^{470} = 2961831216768460800000000000000000000000000000000000000000000000000$, $2^{480} = 30290388376514192704000000000000000000000000000000000000000000000000$, $2^{490} = 309770602958412789614656000000000000000000000000000000000000000000000$, $2^{500} = 3167859737651419270400000000000000000000000000000000000000000000000000$, $2^{510} = 32395270295841278961465600000000000000000000000000000000000000000000000$, $2^{520} = 331273683765141927040000000000000000000000000000000000000000000000000000$, $2^{530} = 3387516029584127896146560000000000000000000000000000000000000000000000000$, $2^{540} = 34638928376514192704000000000000000000000000000000000000000000000000000000$, $2^{550} = 354189521676846080000000000000000000000000000000000000000000000000000000000$, $2^{560} = 3621551029584127896146560000000000000000000000000000000000000000000000000000$, $2^{570} = 37028888376514192704000000000000000000000000000000000000000000000000000000000$, $2^{580} = 378593602958412789614656000000000000000000000000000000000000000000000000000000$, $2^{590} = 3870721216768460800000000000000000000000000000000000000000000000000000000000000$, $2^{600} = 39572828376514192704000000000000000000000000000000000000000000000000000000000000$, $2^{610} = 404565973765141927040000000000000000000000000000000000000000000000000000000000000$, $2^{620} = 4135881029584127896146560000000000000000000000000000000000000000000000000000000000$, $2^{630} = 42279768376514192704000000000000000000000000000000000000000000000000000000000000000$, $2^{640} = 432197702958412789614656000000000$

[illegible]

Ward of
J. S. Hagerman
et al.

[illegible]

FOREMAN, BROWN & HUDGENS

ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA

36602

ALEXANDER FOREMAN, JR. (1914-1966)
ALTON R. BROWN, JR.
A. NEIL HUDGENS
PETER V. SINTZ
JOHN D. RICHARDSON, III
CLAUDE D. HARRELL
J. GEORGE WHITFIELD, JR.

AREA CODE 205
432-2792

February
19th
1971

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

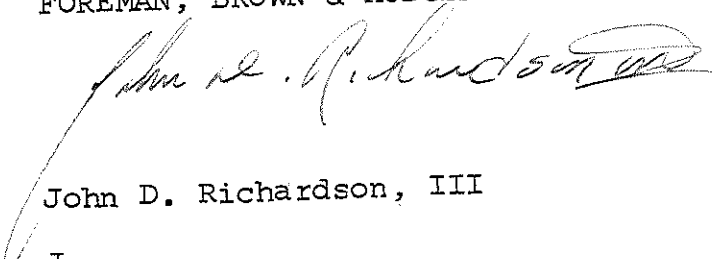
Re: Mrs. M. O. Ward d/b/a Gulf Shores Gift Shoppe
vs. Sullivan, Long and Hagerty
Circuit Court Case Number : 9220

Dear Sir:

We enclose the original copy of the deposition in the above
styled case for filing with the Court.

Sincerely yours,

FOREMAN, BROWN & HUDGENS


John D. Richardson, III

J
D
R
/
kb

Encl.

9220

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
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
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STEPHEN G. CRAWFORD
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W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

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

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

October 15, 1971

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
County Courthouse
Bay Minette, Alabama 36507

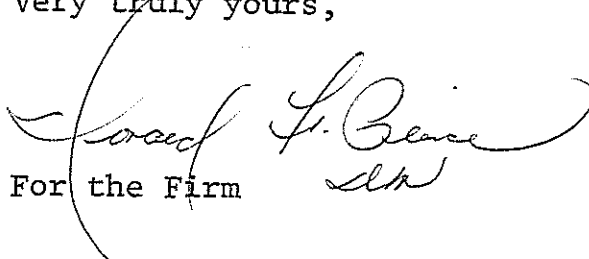
Re: Mrs. M. O. Ward d/b/a Gulf Shores
Gift Shoppe vs. Sullivan, Long &
Hagerty, Inc. - Case No. 9220

Dear Mrs. Blackmon:

Please dismiss the above-styled cause on motion of the plaintiff. The Bill of Cost in the amount of \$27.00 has been paid under date of October 13, 1971 by John D. Richardson, III, Esquire, Attorney for the defendant.

With best regards,

Very truly yours,


For the Firm

DFP/dm

cc: John D. Richardson, III, Esq.

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

DAHLBERG BUILDING

P. O. BOX 729

BAY MINETTE, ALABAMA 36507

September 16, 1971

TELEPHONE NO. 937-4661

Honorable Telfair J. Mashburn
Judge of Circuit Court of Baldwin County
Bay Minette, Alabama 36507

Subject: Ward vs. Sullivan
Law Case No. 9220

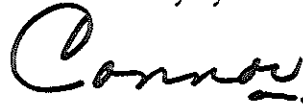
Dear Judge Mashburn:

This is with reference to the above styled matter which I would appreciate very much your setting for trial.

This case was set last time but was continued at the request of the defendant, who has since filed a motion to produce income tax returns. We would agree to the granting of such a motion and will be happy to produce all records desired so that this case might be disposed of.

Thank you for your consideration in this matter.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Connor", with a horizontal line underneath.

J. Connor Owens, Jr.

JCO:am

LAW OFFICES OF
HUEY, STONE & PATTON
SUITE 414 REALTY BUILDING
BESSEMER, ALABAMA 35020

W. GERALD STONE
J. WILLIAM PATTON, JR.
THOS. T. HUEY (1869-1961)
ASSOCIATE
JAMES B. KIERCE, JR.

POST OFFICE BOX 237
TELEPHONE 425-1634

August 30, 1971

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

Re: Charles R. Larrimore v. Sullivan, Long & Hagerty, Case #8655;
Mrs. M. O. Ward d/b/a Gulf Shores Gift Shoppe v. Sullivan,
Long & Hagerty, Case #9220

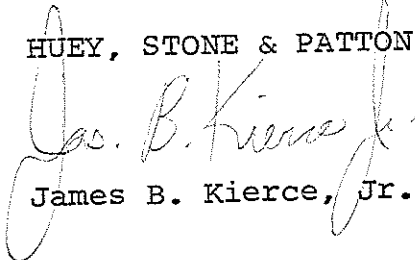
Dear Mrs. Blackmon:

Please enter on your court files the law firm of Huey, Stone & Patton,
W. G. Stone and James B. Kierce, Jr., as attorneys of record, along
with Mr. Richardson, for the defendants in connection with the above
cases.

With best wishes.

Yours very truly,

HUEY, STONE & PATTON


James B. Kierce, Jr.

JBK/jva

cc: Mr. John D. Richardson, III

MRS. M. O. WARD, d/b/a
GULF SHORES GIFT SHOPPE,

Plaintiff,

VS.

SULLIVAN, LONG & HAGERTY,
a corporation, SULLIVAN,
LONG & HAGERTY, a co-
partnership, X, an agent,
servant or employee of the
firm known as SULLIVAN, LONG
& HAGERTY, general contractors,
XYZ, a corporation, and AB&C,
a co-partnership doing business
as SULLIVAN, LONG & HAGERTY,
jointly and severally,

Defendants.

§ IN THE CIRCUIT COURT OF

§ BALDWIN COUNTY, ALABAMA

§ AT LAW

§

§ CASE NO. 9220

§

§

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendants the sum of Fifteen
Thousand and No/100 (\$15,000.00) Dollars, as damages, for a
trespass by the defendants on the following tract of land,
viz:

Starting at the Southeast corner of Section
17, Township 9 South, Range 4 East; run
thence West along the Section line 1770.5
feet, to the East line of Alabama Highway
No. 59; run thence N 7-45 E along the said
East line of Alabama Highway No. 59, 131.49
feet to the point of beginning; run thence
S 82-15 E 213 feet, to the margin of a canal;
run thence N 11-15 W, along the said margin
of the canal 106.15 feet; run thence N 82-15
W 177 feet, to the said East line of Alabama
Highway No. 59; run thence S 7-45 W, along
said East line of Alabama Highway No. 59,
100 feet to the point of beginning, contain-
ing 0.448 acres, being a lot in the S E 1/4
of Section 17, T 9 S, R 4 E,

belonging to or in the possession of the plaintiff.

For that defendants did cause to be placed upon the plaintiff's land, dirt, shells, materials, supplies, vehicles, its employees, and other articles of machinery and supplies while engaged in the construction of a sewer line on and along Alabama Highway No. 59, in the town of Gulf Shores, Alabama, all to the damage of the plaintiff, for which she sues, such trespass beginning on or about the first day of May, 1969 and continuing thereafter for a period of several weeks. Plaintiff claims punitive damages.

COUNT TWO

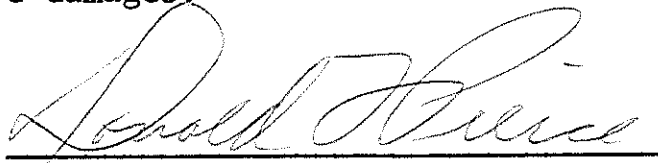
Plaintiff claims of the defendants the sum of Fifteen Thousand and No/100 (\$15,000.00) Dollars, as damages, for that on or about, to-wit, May 1, 1969, while the defendants were engaged in the construction of a sewer line project for the town of Gulf Shores, Alabama, on or along a street or road within said town known as Alabama Highway No. 59, defendants did so negligently perform said construction work as to cause machinery, supplies, dirt debris and other miscellaneous material to be piled upon and across the access way to plaintiff's place of business located in the town of Gulf Shores, Alabama, which access way was necessary for customers to enter and exit from plaintiff's place of business, when defendants knew, or in the exercise of reasonable care should have known, that plaintiff's business

was directly dependent upon such access during the tourist season which encompassed the period that plaintiff's access way was blocked and her customers were limited in getting in and out to purchase goods which plaintiff held for sale to the tourists and members of the general public frequenting the area, and as a direct and proximate result of the negligence of the defendants as aforesaid, plaintiff's business was damaged, her sales were off, her profits were greatly diminished, for all of which she sues and claims damages.

COUNT THREE

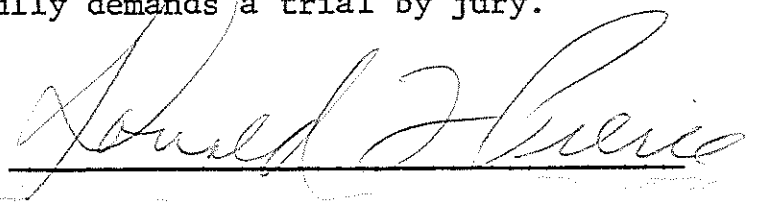
Plaintiff claims of the defendants the sum of Fifteen Thousand and No/100 (\$15,000.00) Dollars, as damages, for that heretofore, and on, to-wit, the 1st day of May, 1969, that defendants did wantonly or willfully block the access way to plaintiff's premises in and about the execution of its contract to build a sewer system for the town of Gulf Shores, Alabama, along Highway No. 59, in said town; and although warned by plaintiff on numerous occasions that her business was blocked so that her customers could not get in and out to purchase the goods she held for sale to the public, defendants failed to remove the machinery, supplies, debris and other miscellaneous items from the plaintiff's property and from blocking the ingress and egress to plaintiff's property, and as a proximate and direct result of the wanton

conduct of the defendants, as aforesaid, plaintiff was damaged in that her business lost profits, lost sales, and her income was greatly diminished, of all of which plaintiff warned defendant, to no avail; therefore, plaintiff claims punitive damages.


Donald F. Pierce

Trial Attorneys for Plaintiff

Plaintiff respectfully demands a trial by jury.



Defendant may be served by service on
an employee or officer of Sullivan,
Long & Hagerty, P. O. Box 2030,
Birmingham, Alabama, 801 Fifth Avenue,
North, Birmingham, Alabama, 35203.

FILED
APR 20 1970
ALICE J. DICK
CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9220

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Sullivan, Long & Hagerty, a co-partnershih, X, an agent
servant, or employee of the firm known as Sullivan, Long & Hagerty
.....
.....

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 Sullivan Long
& Hagerty, a co-partnership, X an agent, servant, employee etc
..... Defendant.....

by Mrs. MO. O. Ward, d/b/a Gulf Shores Gift Shoppe
.....

..... Plaintiff.....

Witness my hand this.....20.....day of.....April.....19.....70

Alice J. Aluch Clerk

4-23-70

VOL

66 PAGE 921

No. 9220

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MRS. M. O. WARD, d/b/a

GULF SHORES GIFT SHOPPE

Plaintiffs

vs.

SULLIVAN, LONG & HAGERTY, a corp

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19

APR 20 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

Donald F. Pierce

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

April 20 1970
Taylor Wilkins Sheriff
I have executed this summons

Executed this the 23 day of APR 23 1970
on by leaving a copy with
Sullivan, Long
Hagerty, a Corp.
Charles Long
agents

and co.

MELVIN BAILEY, Sheriff
Jefferson County, Alabama

Melvin Bailey, Sheriff of
Jefferson County, Alabama,
claims \$1.50 each for serving

process(es) and \$1.00
travel expense on each of

process(es) or a total of

\$2.50

Deputy Sheriff,

Sheriff

Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Anake

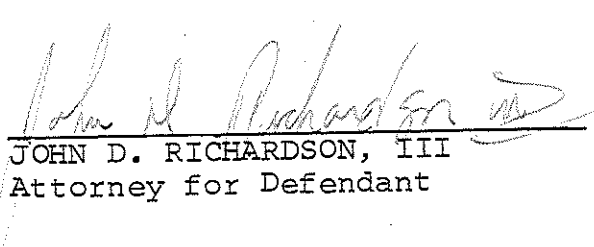
MRS. M. O. WARD, d/b/a	:	IN THE CIRCUIT COURT
GULF SHORES GIFT SHOPPE,	:	
Plaintiff,	:	OF BALDWIN COUNTY,
VS.	:	
SULLIVAN, LONG & HAGERTY, a	:	ALABAMA
corporation, SULLIVAN, LONG	:	
& HAGERTY, a co-partnership,	:	
X, an agent, servant or	:	
employee of the firm known as	:	
SULLIVAN, LONG & HAGERTY, general:	:	AT LAW
contractors, XYZ, a corporation,	:	
and AB&C a co-partnership doing	:	
business as SULLIVAN, LONG &	:	
HAGERTY, jointly and severally,	:	
Defendants.	:	CASE NO. 9220

MOTION TO PRODUCE

Comes now the Defendant, SULLIVAN, LONG & HAGERTY, in the above styled cause, by and through its Attorney, JOHN D. RICHARDSON, III and moves the Court to compel, by order, the Plaintiff to produce and permit the said Defendant to inspect and to copy the following papers, or documents in possession or power of the Plaintiff which are necessary and material to the trial of said cause and contain evidence pertinent to the issues of said trial, to-wit:

1. The Federal Income Tax Returns filed by the Plaintiff or her agent, if any, or a true and correct copy thereof, for the years of 1968, 1969, and 1970 showing her income for said years.

2. The State Income Tax Returns filed by the Plaintiff or her agent, if any, or a true and correct copy thereof, for the years of 1968, 1969, and 1970 showing her income for said years.


JOHN D. RICHARDSON, III
Attorney for Defendant

STATE OF ALABAMA)
COUNTY OF MOBILE)

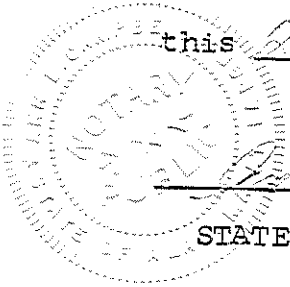
Before me, the undersigned authority, personally appeared JOHN D. RICHARDSON, III known to me, who being sworn deposes and


says that he is the Attorney for the Defendant, SULLIVAN, LONG & HAGERTY in the foregoing cause, and as such has knowledge of the facts set out in the foregoing motion; that the documents therein described contain evidence pertinent to the issues in this cause and that they are necessary and material to a proper disposition of the cause.


JOHN D. RICHARDSON, III

SWORN TO and SUBSCRIBED before me

this 24th day of August, 1971.




NOTARY PUBLIC
STATE OF ALABAMA AT LARGE

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24th day of August, 1971, 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.


JOHN D. RICHARDSON, III

FILED

AUG 26 1971

EUNICE B. BLACKMON CIRCUIT CLERK

BROWN, HUDGENS, FULFORD, SINTZ & RICHARDSON

ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA

36602

To Judge

C7
E
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Judge Atty
called
for order