

THE STATE OF ALABAMA }
Montgomery County
BALDWIN
To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

Walter Powell

Baldwin

to appear before the Circuit Court of ~~Montgomery~~ in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

Kerr-McGee Chemical Corp., a corporation

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 14 day of July

19 70.

Alice J. Duck Clerk

COMPLAINT

THE STATE OF ALABAMA
~~Montgomery~~ Alabama
Elberta
Kerr-McGee Chemical Corp.,
a corporation
Plaintiff

VS.

In the Circuit Court of ~~Montgomery~~ Baldwin
County
Walter Powell
Term, 19
Defendant

The plaintiff claim of the Defendant the sum of Two Thousand Seven Hundred Seventy-four and 31/100 Dollars, (\$2,774.31), due from the Defendant by account on the 31st day of October, 1965, which sum of money together with interest thereon at 8% per annum since maturity is still due and unpaid.

The Plaintiff attaches hereto and incorporates herein an itemized and verified statement of the account which is the basis of this suit.

Tom McGregor
Tom McGregor,
Attorney for Plaintiff
401 Hill Building
Montgomery, Alabama
265-0201

FILED

JUL 14 1970

ALICE J. DUCK

CLERK
REGISTRAR

VOL

65 684

THE STATE OF ALABAMA

Montgomery County

To the Sheriff of Said County—GREETINGS.

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this

day of

A. D., 19

Clerk, Circuit Court, Montgomery County.

No. 9383

Kerr-McGee Chemical Corp.,
a corporation

vs.

Walter Powell
Route 1, Box 41-A
Elberta, Alabama

CIRCUIT COURT
BALDWIN
OF MONTGOMERY COUNTY

Term, 19

SUMMONS AND
COMPLAINT

Filed In office this day of

A. D. 19

Clerk.

Tom McGregor

Plaintiff's Attorney

Received In office

14

day of

July

19 70

Taylor Wilkins

Sheriff

Executed by serving

cop

of the within. Summons and Complaint on

Defendant this the 8 - Sept day of

19 70

70A

Raymond Wilkins

Sheriff

Charles H. Hester
72

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Childress
DEPUTY SHERIFF

SUBJECT: ITEMIZED STATEMENT

WALTER POWELL ACCOUNT NO.# 207735-00301-02-17

YEAR	DATE	INVOICE NO.#	CHARGES	CREDITS
1965	10/31/65	Bal. Forward	234.44	
1966	5/30/66	08617	96.30	
	2/25/66	18506	178.50	
	2/26/66	18510	152.84	
	2/26/66	18514	234.60	
	4/6/66	26212	330.75	
	4/8/66	26214	73.50	
	4/27/66	26273	433.08	
	4/27/66	26275	47.00	
	5/23/66	26356	86.25	
	5/24/66	26360	69.00	
	6/18/66	26405	175.50	
	4/1/66	08509	211.50	
	4/6/66	08516	38.40	
	4/13/66	08527	97.50	
	4/25/66	08555	14.70	
	4/28/66	08568	120.00	
	6/18/66	08637	105.60	
	9/8/66	08713	106.25	
	4/27/66	Payment		6.40
1968	8/6/68	"		<u>25.00</u>
		TOTAL.....	2805.71	31.40

AMOUNT OWED ON ACCOUNT AS OF SEPTEMBER 23, 1968.....\$2774.31

AT 82-10871

TOM MCGREGOR
ATTORNEY AT LAW
408 HILL BUILDING PHONE 263-0140
MONTGOMERY, ALABAMA 36104

October 19, 1970

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

Dear Sir:

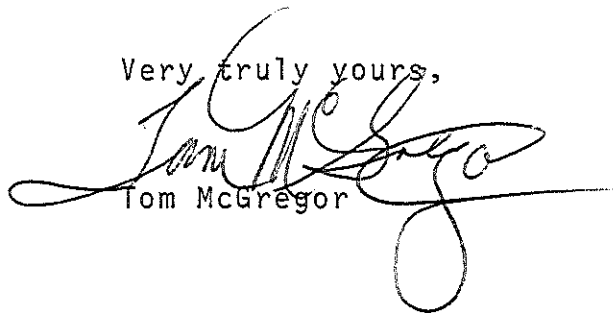
RE: Kerr-McGee Chemical Corp. vs. Walter Powell
Case Number 9383

In the above styled case, the Defendant was served on September 8, 1970. Since the Defendant has not made an appearance or filed any motions on his behalf, it would be appreciated if you would render a judgment by default in favor of the Plaintiff.

The amount of the judgment should be \$2,774.31 plus interest at the rate of 8% per annum from September 23, 1968, through October 19, 1970, in the amount of \$475.86 plus court costs.

Your kind consideration in this matter would be appreciated.

Very truly yours,


Tom McGregor

TMcG:afs

TOM MCGREGOR
ATTORNEY AT LAW
408 HILL BUILDING PHONE 263-0140
MONTGOMERY, ALABAMA 36104

July 13, 1970

no. 9383

no. 9384

Clerk of Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Gentlemen:

I am enclosing herein two suits which I would appreciate your filing. Please let me know when these suits have been served.

Very truly yours,


Tom McGregor

TMG:afs

Enclosure