TELEPHONE AREA CODE 205 897-2894

### Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

March 1, 1971

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

> Re: Kerr-McGee vs Billy McKenzie Case No. 9448

POST OFFICE BOX 356

Dear Mrs. Duck:

Please ask the court to dismiss the above matter, "with prejudice", and forward a cost to me as attorney for the plaintiff in this cause. Within a few days, we will forward to you the cost in this matter.

Thanking you and with my personal regards, I am,

Sincerely,

Jackson W. Stokes

JWS/jf

DALEVILLE OFFICE: STOKES & NOMBERG P. O. BOX 652 DALEVILLE, ALABAMA 36322

TELEPHONE { 598-6261 598-6262 JACKSON W. STOKES JOEL M. NOMBERG

## JACKSON W. STOKES ATTORNEY AT LAW

September 24, 1970

TELEPHONE AREA CODE 205 897-2894

POST OFFICE BOX 356 ELBA, ALABAMA 36323

Mr. Billy McKenzie Route 2, Box 206 Fairhope, Alabama

> Re: Kerr McGee vs. McKenzie Cases No. 9448 & 9454

Dear Mr. McKenzie:

This will acknowledge our telephone conversation of this date, with reference to the pendance of two cases against you in the Circuit Court of Baldwin County, Alabama.

As attorney for the Plaintiff, you are advised that we will extend the time for you to answer in these two cases until December 1, 1970, in hopes that you might be able to make payment of the amount claimed. In the meantime, please advise me if you are in a position to make payment of these amounts prior to the above date, and we will get these matters disposed of.

Thanking you and with my regards, I am,

Sincerely,

Jackson W. Stokes

JWS/jp

cc: Mr Bill Miller

Kerr McGee Chemical Corporation

4735 Old Canton Road Jackson, Mississippi

Mrs. Alice Duck Circuit Clerk County Courthouse Bay Minette, Alabama

SEP 2 8 1970

ALUE J. DUGK CLERK REGISTER STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Billie McKenzie, Route 2, Box 206, Fairhope, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty days from service hereof and answer plead or demur to the complaint of Kerr McGee Chemical Corporation, a Corporation.

Witness my hand this \_\_\_\_ day of August, 1970.

#### Circuit Clerk

KERR McGEE CHEMICAL CORPORATION, INC.\* A Corporation,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Plaintiff

AT LAW

BILLY MCKENZIE,

VS

CASE NO. 944

Defendant

Plaintiff claims of the Defendant the sum of Three Thousand, Five Hundred, Forty four Dollars and eighty seven cents (\$3,544.87), due by promissory note made by him on the 6th day of February, 1969. The Plaintiff alleges that as a part of said note, the Defendant agreed that in the event any installment was not paid when due, then the balance shall become due and payable, and that said amount, together with interest thereon is due.

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

Plaintiff further alleges that the Defendant agreed to pay a reasonable Attorney's fee for the collection of said note and he alleges that Four Hundred and Fifty Dollars (\$450.00), is such a reasonable fee.

Attorney for Plaintiff

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

Defendant's Address: Route 2, Box 206 Fairhope, Alabama

AUG 25 1970

I hereby acknowledge myself as security for cost in the foregoing matter.

AUG 25 1970

ALGE J. DUCK CLERK REGISTER

# JACKSON W. STOKES ATTORNEY AT LAW August 24, 1970

TELEPHONE AREA CODE 205 897-2894

POST OFFICE BOX 356 ELBA. ALABAMA 36323

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

Re: Kerr McGee vs. Billy McKenzie

9448

Dear Mrs. Duck:

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

Thanking you and with my regards, I am,

Sincerely,

Jackson W. Stokes

JWS/jp

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Billie McKenzie, Route 2, Box 206, Fairhope, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty days from service hereof and answer plead or demur to the complaint of Kerr McGee Chemical Corporation, a Corporation.

Witness my hand this 25 day of August, 1970.

KERR McGEE CHEMICAL CORPORATION, INC.\* A Corporation,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Plaintiff \*

AT LAW

BILLY MCKENZIE,

VS

CASE NO. GULLS

Defendant

Plaintiff claims of the Defendant the sum of Three Thousand, Five Hundred, Forty four Dollars and eighty seven cents (\$3,544.87), due by promissory note made by him on the 6th day of February, 1969. The Plaintiff alleges that as a part of said note, the Defendant agreed that in the event any installment was not paid when due, then the balance shall become due and payable, and that said amount, together with interest thereon is due.

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

Plaintiff further alleges that the Defendant agreed to pay a reasonable Attorney's fee for the collection of said note and he alleges that Four Hundred and Fifty Dollars (\$450.00), is such a reasonable fee.

. AOF

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

AUG 25 1970

Defendant's Address: Route 2, Box 206 Fairhope, Alabama

65 PAGE 714 RUE J. DUGK REGISTER

I hereby acknowledge myself as security for cost in the foregoing matter.

YSMM |

AUG251970

ALGE I. DUCK CLERK REGISTER

Kerr-Mª Lee Chemical losp. Ten Cents per mile Total \$ 7,00
TAYLOR WILKINS, Sheriff
Or male Billy Mi Kenzil

## 

AUG 25 1970

Ty service of 70 miles 5

Jackson W. Stokes