STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Kyle Flowers, Route Three, Foley, Alabama, to be and appear before the Circuit Court of Bladwin County, Alabama, and answer, plead or demur within the time required by law to the complaint of Kerr-McGee Chemical Corporation.

Witness my hand this day of September, 1970.

KERR McGEE CHEMICAL CORPORATION, A Corporation,

IN THE CIRCUIT COURT OF

Duck.

BALDWIN COUNTY, ALABAMA

Plaintiff

AT LAW

VS

9489

KYLE FLOWERS,

Defendant

COUNT I.

Plaintiff claims of the Defendant the sum of Three Hundred, Fifty Six Dollars and thirteen cents (\$356.13), due by promissory note made by him on the 9th day of April, 1969, and payable on the 15th day of July, 1969, which sum of money, together with interest thereon is due and payable.

Plaintiff alleges that as a part of said promissory note, the Defendant waived all his right on benefits available to him under any homestead, execution or other exemption now or hereafter in effect in any state where judgement may be entered on said promissory note.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable attorney's fee in the event of suit for collection of said note, and Plaintiff alleges that One Hundred Dollars (\$100.00), would be a reasonable sum as such attorney's fee.

COUNT II

Plaintiff claims of the Defendant the sum of Three Hundred, Sixty Nine Dollars and seventy four cents (\$369.74), due by promissory note made by him on the 9th day of April, 1969, and payable on the 12th day of December, 1969, which sum of money, together with interest thereon is due and unpaid.

Plaintiff alleges that as a part of said promissory note, Defendant waived all his right of benefits available to him under any homestead, execution or other exemptions now or hereafter in effect in any state where judgement may be entered on said promissory note.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable attorney's fee in the event of suit for collection of said note, and Plaintiff alleges that One Hundred Dollars (\$100.00), would be a reasonable sum as such attorney's fee.

Actorney for Plaintiff

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

I hereby acknowledge myself as security for cost in this cause.

forney for Plaintiff

SEP 1 8 1970

ALUE J. BIBN CLERK REGISTER

4 VOL 65 PAGE 773

Et 10-9-70

9489

Kerr-Missee Chemical

Corp. a Cor R

Pets

res.

Kyle Howers

Dept

SEP 1 8 1970

ALLE J. DESS RESISTER

en Centr fel mile Total \$ 22 en Centr fel mile Total \$ 22 en Centr fel mile Total \$ 22 en Centr fel miles et concentration of the concentration of the central systems of the central s

Pry service on

Sheriff

1

Jackson W. Stokes

Jackson W. Stokes

POST OFFICE BOX 356

TELEPHONE AREA CODE 205 897-2894

ATTORNEY-AT-LAW

Elba, Alabama 36323 January 13, 1971

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

> Re: Kerr McGee vs Kyle Flowers Case No. 9489

Dear Mrs. Duck:

Please ask the Court to dismiss the above matter with prejudice and advise me as to court cost, as this matter has been settled.

Thanking you and with my regards, I am,

Sincerely,

Jackson W. Stokes

JWS/jp

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

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

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Kyle Flowers, Route Three, Foley, Alabama, to be and appear before the Circuit Court of Bladwin County, Alabama, and answer, plead or demur within the time required by law to the complaint of Kerr-McGee Chemical Corporation.

Witness my hand this // day of September, 1970.

Circuit Clerk

KERR McGEE CHEMICAL CORPORATION, A Corporation,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

Plaintiff

AT LAW

VS

* * * 9489

KYLE FLOWERS,

Defendant

COUNT I.

Plaintiff claims of the Defendant the sum of Three Hundred, Fifty Six Dollars and thirteen cents (\$356.13), due by promissory note made by him on the 9th day of April, 1969, and payable on the 15th day of July, 1969, which sum of money, together with interest thereon is due and payable.

Plaintiff alleges that as a part of said promissory note, the Defendant waived all his right on benefits available to him under any homestead, execution or other exemption now or hereafter in effect in any state where judgement may be entered on said promissory note.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable attorney's fee in the event of suit for collection of said note, and Plaintiff alleges that One Hundred Dollars (\$100.00), would be a reasonable sum as such attorney's fee.

COUNT II

Plaintiff claims of the Defendant the sum of Three Hundred, Sixty Nine Dollars and seventy four cents (\$369.74), due by promissory note made by him on the 9th day of April, 1969, and payable on the 12th day of December, 1969, which sum of money, together with interest thereon is due and unpaid.

Plaintiff alleges that as a part of said promissory note, Defendant waived all his right of benefits available to him under any homestead, execution or other exemptions now or hereafter in effect in any state where judgement may be entered on said promissory note.

Plaintiff further alleges that as a part of said promissory note, the Defendant agreed to pay a reasonable attorney's fee in the event of suit for collection of said note, and Plaintiff alleges that One Hundred Dollars (\$100.00), would be a reasonable sum as such attorney's fee.

Attorney for Plaintiff

Attorney for Plaintiff

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

I hereby acknowledge myself as security for cost in this cause.

SEP 1 8 1970

ALIGE J. DUGK CLERK REGISTER

JACKSON W. STOKES ATTORNEY AT LAW September 17, 1970

TELEPHONE AREA CODE 205 897-2894 POST OFFICE BOX 356 ELBA, ALABAMA 36323

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

Re: Kerr McGee vs. Kyle Flowers

Dear Mrs. Duck:

Please file the enclosed summons and complaint and hand to the Sheriff for service. I would appreciate your advising as to when service has been perfected.

Thanking you and with my regards, I am,

Sincerely,

Íackson W. Stokes

JWS/jp