

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

February 11, 1971

POST OFFICE BOX 356

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

9685

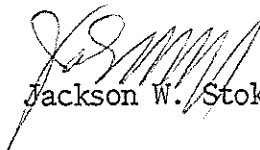
Re: Kerr-McGee Chemical Corp.
vs. Otis Gipson, Lillian, Ala.

Dear Mrs. Duck:

Enclosed herewith is the original and two copies of a complaint in the foregoing cause. Please file same and hand to the Sheriff for service. I would appreciate your advising as to the date of service of this complaint.

Thanking you and with my regards, I am,

Sincerely,


Jackson W. Stokes

JWS/jf

Enclosure

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

TELEPHONE { 598-6261
 { 598-6262

JACKSON W. STOKES
JOEL M. NOMBERG

Extra copy

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Otis Gipson, Lillian, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty (30) 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 February, 1971.

Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

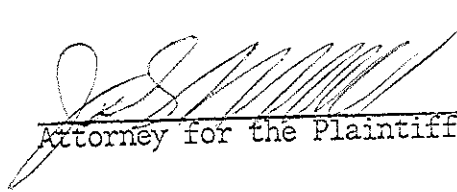
OTIS GIPSON,

Defendant

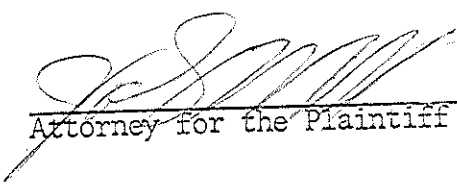
* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO 9685
*
*

The plaintiff claims of the defendant the sum of \$1,938.98 due by account stated, between the defendant and plaintiff from June 6, 1968, to January 1, 1971, which sum of money together with interest thereon, is due and unpaid.

Plaintiff alleges that this suit is based on a sworn verified account, a copy of which is attached hereto and made a part hereof.


Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

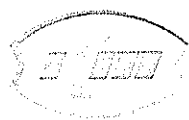

Attorney for the Plaintiff

Jackson W. Stokes
P. O. Box 356
Elba, Alabama

Address Alabama 36549

DATE

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Jun 23 68				.00	
Jun 6 68	14773	312.66		312.66	
Sep 23 68	SC	3.13		315.79	
Oct 11 68	40638	224.64		540.43	
Oct 10 68	40637	67.95		608.38	
Oct 23 68	SC	3.16		611.54	
Nov 23 68	177		315.79 CR	295.75	
Nov 21 68	42952	54.00		349.75	
Nov 21 68	42953	235.12		584.87	
Nov 23 68	SC	.03		584.90	
Nov 26 68	43461	140.09		724.99	
Dec 9 68	43689	64.53		789.52	
Dec 20 68	43691	74.43		863.95	
Dec 6 68	43692	146.52		1,010.47	
Dec 6 68	76		114.50 CR	895.97	
Apr 22 69	107544	24.75		920.72	
May 5 69	109438	11.00		931.72	
May 7 69	110985	178.64		1,110.36	
May 7 69	112055	105.40		1,215.76	
May 22 69	112054	151.40		1,367.16	
May 12 69	116721	130.50		1,497.66	
Jun 9 69	116720	43.50		1,541.16	
May 24 69	116719	75.70		1,616.86	
May 31 69	116718	114.75		1,731.61	
Oct 23 69	SC	17.32		1,748.93	
Nov 6 69	320703	119.66		1,868.59	
Nov 6 69	320707	261.36		2,129.95	
Nov 7 69	320712	332.17		2,462.12	
Nov 12 69	320729	144.38		2,606.50	
Nov 23 69	SC	17.49		2,623.99	
Dec 23 69	SC	17.66		2,641.65	
Jan 23 70	SC	17.84		2,659.49	
Feb 23 70	SC	18.02		2,677.51	
Mar 23 70	SC	18.20		2,695.71	
Apr 23 70	SC	18.38		2,714.09	
May 23 70	SC	18.57		2,732.66	
Jun 23 70	SC	27.33		2,759.99	
Jul 23 70	SC	27.60		2,787.59	
Aug 23 70	SC	27.88		2,815.47	
Sep 23 70	SC	28.16		2,843.63	
Oct 23 70	SC	28.43		2,872.06	
Nov 23 70	SC	28.72		2,900.78	



KERR-MCGEE OFFICIAL COPY

CREDIT AMOUNT _____
AMOUNT _____
DATE _____

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Nov 70	Bal For			2,900.78	
Dec 17 70			1,000.00 CR	1,900.78	
Dec 23 70	SC	19.00		1,919.78	
Jan 1 71	SC	19.20		1,938.98	
THIS ACCOUNT IS, WITHIN THE KNOWLEDGE OF AFFIANT, JUST AND TRUE AND ALL JUST AND LAWFUL OFFSETS, PAYMENTS AND CREDITS HAVE BEEN ALLOWED. <u>B.C. Miller</u> B. C. Miller, Regional Credit Manager STATE OF MISSISSIPPI COUNTY OF HINDS SWORN TO AND SUBSCRIBED BEFORE ME THIS 8th DAY OF FEBRUARY, 1971. <u>[Signature]</u> NOTARY PUBLIC My Commission Expires March 10, 1973					

NOTARY PUBLIC

My Commission Expires March 10, 1973

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Otis Gipson, Lillian, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty (30) days from service hereof, and answer, plead or demur to the complaint of Kerr-McGee Chemical Corporation, a corporation.

Witness my hand this 12 day of February, 1971.

Eunice B. Blackmon
Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

OTIS GIPSON,

Defendant

*
*
*
*
*
*
*
*
*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO 9685

The plaintiff claims of the defendant the sum of \$1,938.98 due by account stated, between the defendant and plaintiff from June 6, 1968, to January 1, 1971, which sum of money together with interest thereon, is due and unpaid.

Plaintiff alleges that this suit is based on a sworn verified account, a copy of which is attached hereto and made a part hereof.

[Signature]
Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

[Signature]
Attorney for the Plaintiff

Jackson W. Stokes
P. O. Box 356
Elba, Alabama

FILED

FEB 12 1971

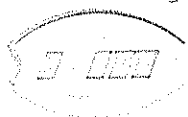
EUNICE B. BLACKMON CIRCUIT CLERK

William
ADDRESS Alabama 36549

AMOUNT _____

DATE _____

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Jun 23 68				.00	
Jun 6 68	14773	312.66		312.66	
Sep 23 68	SC	3.13		315.79	
Oct 11 68	40638	224.64		540.43	
Oct 10 68	40637	67.95		608.38	
Oct 23 68	SC	3.16		611.54	
Nov 23 68	177		315.79 CR	295.75	
Nov 21 68	42952	54.00		349.75	
Nov 21 68	42953	235.12		584.87	
Nov 23 68	SC	.03		584.90	
Nov 26 68	43461	140.09		724.99	
Dec 9 68	43689	64.53		789.52	
Dec 20 68	43692	74.43		863.95	
Dec 6 68	43692	146.52		1,010.47	
Dec 6 68	76		114.50 CR	895.97	
Apr 22 69	107544	24.75		920.72	
May 5 69	109438	11.00		931.72	
May 7 69	110985	178.64		1,110.36	
May 7 69	112055	105.40		1,215.76	
May 22 69	112054	151.40		1,367.16	
May 12 69	116721	130.50		1,497.66	
Jun 9 69	116720	43.50		1,541.16	
May 24 69	116719	75.70		1,616.86	
May 31 69	116718	114.75		1,731.61	
Oct 23 69	SC	17.32		1,748.93	
Nov 6 69	320703	119.66		1,868.59	
Nov 6 69	320707	261.36		2,129.95	
Nov 7 69	320712	332.17		2,462.12	
Nov 12 69	320729	144.38		2,606.50	
Nov 23 69	SC	17.49		2,623.99	
Dec 23 69	SC	17.66		2,641.65	
Jan 23 70	SC	17.84		2,659.49	
Feb 23 70	SC	18.02		2,677.51	
Mar 23 70	SC	18.20		2,695.71	
Apr 23 70	SC	18.38		2,714.09	
May 23 70	SC	18.57		2,732.66	
Jun 23 70	SC	27.33		2,759.99	
Jul 23 70	SC	27.60		2,787.59	
Aug 23 70	SC	27.88		2,815.47	
Sep 23 70	SC	28.16		2,843.63	
Oct 23 70	SC	28.43		2,872.06	
Nov 23 70	SC	28.72		2,900.78	



KERR-MISSEY & ASSOCIATES

216121 009 01 02 17
NAME Otis Gipson
Lillian, Alabama 36549
ADDRESS

CREDIT AMOUNT
AMOUNT _____
DATE _____

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Nov 70	Bal For			2,900.78	
Dec 17 70			1,000.00 CR	1,900.78	
Dec 23 70	SC	19.00		1,919.78	
Jan 1 71	SC	19.20		1,938.98	
THIS ACCOUNT IS, WITHIN THE KNOWLEDGE OF AFFIANT, JUST AND TRUE AND ALL JUST AND LAWFUL OFFSETS, PAYMENTS AND CREDITS HAVE BEEN ALLOWED.					
<u>B.C. Miller</u> B. C. Miller, Regional Credit Manager					
STATE OF MISSISSIPPI COUNTY OF HINDS					
SWORN TO AND SUBSCRIBED BEFORE ME THIS 8th DAY OF FEBRUARY, 1971.					
<u>Mr. Dan R. [Signature]</u> NOTARY PUBLIC					
My Commission Expires March 10, 1973					

100

VOL

68 PAGE 552

9685

Kerr McGee Chemical
Corp.

vs.

Otis Gipson

Sheriff dated 12/12/71 miles at
Ten cents per mile Total \$ 1.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

Received 12 day of Feb. 19 71
and on 20 day of Feb. 19 71
I served a copy of the within SCC
on Otis Gipson

By service on

TAYLOR WILKINS, Sheriff
BY [Signature]
S.

FILED

FEB 12 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

68 PAGE 553

Jackson W. Stokes
P.O. Box 356 - Elba

KERR MCGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

OTIS GIPSON,

Defendant

*
*
*
*
*
*
*
*
*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9685

Comes now the Plaintiff, by and through it's Attorney of record, and moves the Court to dismiss the foregoing styled cause, with prejudice, and tax the Plaintiff with the costs.

FILED

DEC 3 1971

UNICE B. BLACKMON CIRCUIT CLERK



Attorney for the Plaintiff

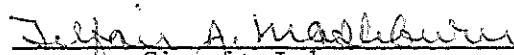
O R D E R

The foregoing motion having been presented to the Court this date and the same having been understood and considered;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the Court that the foregoing motion of the Plaintiff is granted, and this matter is dismissed, with prejudice.

IT IS FURTHER ORDERED, that the Plaintiff be taxed with the costs in this cause, for which let execution issue.

Done this 7th day of December, 1971.


Circuit Judge

KERR-McGEE CHEMICAL CORPORATION,
a corporation,

Plaintiff,

VS.

OTIS GIPSON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

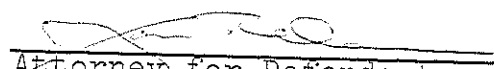
AT LAW

NO. 9685

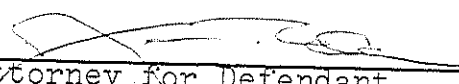
PLEA

Now comes the defendant in the above styled cause and
for plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.

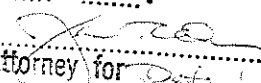

Attorney for Defendant

Defendant demands a trial by
jury of said cause.


Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 10th day
of March, 1971.


Attorney for Defendant

FILED

MAR 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK