

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Otto Schoen, Elberta, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, and answer, plead, or demur to the complaint of Kerr-McGee Chemical Corporation, a corporation.

Witness my hand this 15 day of February, 1971.

Eunice B. Blackmon
Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

OTTO SCHOEN,

Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO 9686
*
*

The plaintiff claims of the defendant the sum of \$681.85 due by account stated, between the defendant and plaintiff from June 11, 1969, to January 23, 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.

J. W. Stokes
Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

J. W. Stokes
Attorney for the Plaintiff

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

FILED

FEB 15 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

ADDRESS Elberta
Alabama

DATE _____

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
May 25 69		.00		.00	
Jun 11 69	114747	625.50		625.50	
Jun 12 68	114748	8.50		661.00	
Jun 24 69	119212		8.50	652.50	
Jun 24 69	119213	130.50		783.00	
Jun 11 69	117864	65.25		848.25	
Jul 23 69	SC	6.52		854.77	
Aug 23 69	SC	6.59		861.36	
Sep 23 69	SC	6.66		868.02	
Oct 23 69	SC	6.72		874.74	
Nov 23 69	SC	6.79		881.53	
Dec 23 69	SC	6.86		888.39	
Jan 23 70	SC	6.93		895.32	
Feb 23 70	SC	7.00		902.32	
Mar 23 70	SC	7.07		909.39	
Apr 23 70	SC	7.14		916.53	
May 23 70	SC	7.21		923.74	
Jun 23 70	SC	9.24		932.98	
Jul 23 70	SC	9.33		942.31	
Jul 28 70			300.00	642.31	
Aug 23 70	SC	6.43		648.74	
Sep 23 70	SC	6.49		655.23	
Oct 23 70	SC	6.56		661.79	
Nov 23 70	SC	6.62		668.41	
Dec 23 70	SC	6.69		675.10	
Jan 23 71	SC	6.75		681.85	

THIS ACCOUNT IS, WITHIN THE KNOWLEDGE OF THE AFFIANT, JUST AND TRUE AND ALL
~~JUST AND LAWFUL OFFSETS, PAYMENTS AND CREDITS HAVE BEEN ALLOWED.~~

B.C. Miller
B. C. Miller, Regional Credit Manager

STATE OF MISSISSIPPI
COUNTY OF HINDS

Sworn to and subscribed before me this 10th day of February 1971.

My Commission Expires March 10, 1973

[Signature]
NOTARY PUBLIC

NER

7-211P



KERR-MCGEE

24-3-18-71

VOL

67 PAGE 762

9686

Kerr. Mc Gee Chemical
Corp. a corp.

vs.

Otto Schoen

Sheriff claims 14 miles at
Ten cents per mile Total \$ 1.40
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

Received 10 day of Feb. 19 74
and on 10 day of March 19 74
I served a copy of the within Sec
on Otto Schoen
By service on _____

TAYLOR WILKINS, Sheriff
BY [Signature]
D.S.

FILED

FEB 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Atty

Jackson W. Stokes
P.O. Box 356, Ellettsville

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

February 12, 1971

POST OFFICE BOX 356

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

Re: Kerr-McGee vs. Otto Schoen;
Kerr-McGee vs. Donald Lee Knight

Dear Mrs. Duck:

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

Thanking you and with my regards, I am,

Sincerely,

Bill
Jackson W. Stokes

JWS/jf

Enclosures

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

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Otto Schoen, Elberta, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, and answer, plead, or demur to the complaint of Kerr-McGee Chemical Corporation, a corporation.

Witness my hand this 15 day of February, 1971.

Eunice B. Blackmon
Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

OTTO SCHOEN,

Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO 9686
*
*

The plaintiff claims of the defendant the sum of \$681.85 due by account stated, between the defendant and plaintiff from June 11, 1969, to January 23, 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.

J. W. Stokes
Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

J. W. Stokes
Attorney for the Plaintiff

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

FILED

FEB 15 1971

EUNICE B. BLACKMON CIRCUIT CLERK

ADDRESS Elberta
Alabama

DATE _____

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
May 25 69		.00		.00	
Jun 11 69	114747	625.50		625.50	
Jun 12 68	114748	8.50		661.00	
Jun 24 69	119212		8.50	652.50	
Jun 24 69	119213	130.50		783.00	
Jun 11 69	117864	65.25		848.25	
Jul 23 69	SC	6.52		854.77	
Aug 23 69	SC	6.59		861.36	
Sep 23 69	SC	6.66		868.02	
Oct 23 69	SC	6.72		874.74	
Nov 23 69	SC	6.79		881.53	
Dec 23 69	SC	6.86		888.39	
Jan 23 70	SC	6.93		895.32	
Feb 23 70	SC	7.00		902.32	
Mar 23 70	SC	7.07		909.39	
Apr 23 70	SC	7.14		916.53	
May 23 70	SC	7.21		923.74	
Jun 23 70	SC	9.24		932.98	
Jul 23 70	SC	9.33		942.31	
Jul 28 70			300.00	642.31	
Aug 23 70	SC	6.43		648.74	
Sep 23 70	SC	6.49		655.23	
Oct 23 70	SC	6.56		661.79	
Nov 23 70	SC	6.62		668.41	
Dec 23 70	SC	6.69		675.10	
Jan 23 71	SC	6.75		681.85	

THIS ACCOUNT IS, WITHIN THE KNOWLEDGE OF THE AFFIANT, JUST AND TRUE AND ALL
JUST AND LAWFUL OFFSETS, PAYMENTS AND CREDITS HAVE BEEN ALLOWED.

B. C. Miller

B. C. Miller, Regional Credit Manager

STATE OF MISSISSIPPI
COUNTY OF HINDS

Sworn to and subscribed before me this 10th day of February 1971.

My Commission Expires March 10, 1973

[Signature]
NOTARY PUBLIC

NCR-2000



KERR-MCGEE

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

May 20, 1971

POST OFFICE BOX 356

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

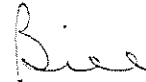
Re: Kerr McGee vs. Schoen
Case No. 9686

Dear Mrs. Blackmon:

Please ask the Court to dismiss the above styled cause with prejudice
and forward your cost bill to me at your earliest convenience.

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

9686
