

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons E. H. Mooney, Jr., to be and appear within thirty days from the date of service hereof in 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 _____ day of February, 1971.

Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

E. H. MOONEY, JR.,

Defendant

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

The plaintiff claims of the defendant \$4,665.25 due by promissory note made by the defendant on the 20th day of December, 1968, and payable on the 20th day of November 1969, which sum of money, together with interest thereon, is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the defendant agreed to pay a reasonable attorney's fee and that such a reasonable fee is \$250.00.



Attorney for Plaintiff

I, Jackson W. Stokes, attorney for the plaintiff, do hereby acknowledge myself as security for cost in this cause.

FILED

FEB 16 1971

EUNICE B. BLACKMON
CIRCUIT CLERK



Attorney for Plaintiff

Defendant's address:
Route 1, Box 232-A
Atmore, Alabama

Attorney for the plaintiff:
Jackson W. Stokes
P. O. Box 356
Elba, Alabama

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

POST OFFICE BOX 356

February 15, 1971

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

9692

Re: Kerr-McGee Chemical Corp.
vs. E. H. Mooney, Jr.

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,

Bill
Jackson W. Stokes

JWS/jf

Enclosure

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

TELEPHONE { 598-6261
598-6262

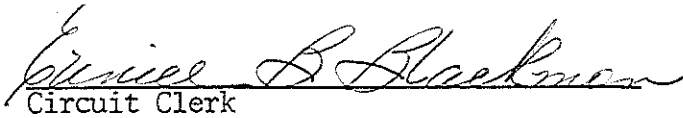
JACKSON W. STOKES
JOEL M. NOMBERG

STATE OF ALABAMA
COUNTY OF BALDWIN

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Witness my hand this 16 day of February, 1971.


Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

E. H. MOONEY, JR.,


Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO 9692
*
*

The plaintiff claims of the defendant \$4,665.25 due by promissory note made by the defendant on the 20th day of December, 1968, and payable on the 20th day of November 1969, which sum of money, together with interest thereon, is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the defendant agreed to pay a reasonable attorney's fee and that such a reasonable fee is \$250.00.



Attorney for Plaintiff

I, Jackson W. Stokes, attorney for the plaintiff, do hereby acknowledge myself as security for cost in this cause.

FILED

FEB 16 1971

EUNICE B. BLACKMON CIRCUIT
CLERK


Attorney for Plaintiff

Defendant's address:
Route 1, Box 232-A
Atmore, Alabama

Attorney for the plaintiff:
Jackson W. Stokes
P. O. Box 356
Elba, Alabama

9692

Kerr-McGee Chemical
Corp.

vs.

E. H. Mooney, Jr.

FEB 16 1971

100-100000-100000
SHAW

Returned 20 day of 400 1971
Not found in my county after diligent search and in-
quiry.

88 Byrne
Taylor Watkins, Sheriff

By _____
Deputy Sheriff

Jackson W. Stokes

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons E. H. Mooney, Jr., to be and appear within thirty days from the date of service hereof in 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 16 day of February, 1971.


Circuit Clerk

KERR-McGEE CHEMICAL CORPORATION,
A Corporation,

Plaintiff

VS

E. H. MOONEY, JR.,


Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO 9692
*
*

The plaintiff claims of the defendant \$4,665.25 due by promissory note made by the defendant on the 20th day of December, 1968, and payable on the 20th day of November 1969, which sum of money, together with interest thereon, is due and unpaid.

Plaintiff alleges that as a part of said promissory note, the defendant waived all of his rights of exemptions under the laws of the State of Alabama and the United States.

Plaintiff further alleges that as a part of said promissory note, the defendant agreed to pay a reasonable attorney's fee and that such a reasonable fee is \$250.00.



Attorney for Plaintiff

I, Jackson W. Stokes, attorney for the plaintiff, do hereby acknowledge myself as security for cost in this cause.

FILED

FEB 16 1971

EUNICE B. BLACKMON
CIRCUIT CLERK


Attorney for Plaintiff

Defendant's address:
Route 1, Box 232-A
Atmore, Alabama

Attorney for the plaintiff:
Jackson W. Stokes
P. O. Box 356
Elba, Alabama

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

May 25, 1971

POST OFFICE BOX 356

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

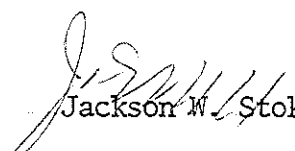
Re: Kerr McGee vs. E. H. Mooney
Case No. 9692

Dear Mrs. Blackmon:

My record reflects that Mr. Mooney is a resident of the State of Florida and service has not been perfected on him. It could be that since my last correspondence with you that the Sheriff has found Mr. Mooney and served him. I would appreciate your advising if service has been perfected and if not, please ask the Court to dismiss this matter and forward to me your bill for cost.

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

Bay Minette, Ala., Feb 16 1971

To the Sheriff of Escambia County, Brewton, Alabama

I enclose herewith S & C for C. N. Money, Jr.

Rt. 1, Box 232-A

Atmore, Ala.

Moved to Oak Grove, Fla.

D. S. Byrne, Sheriff
Taylor Wilkins

Sheriff, Baldwin County, Alabama

Please serve and return as early as possible.

(If not found in your county, please advise promptly giving information as to present location if possible)