

AIR PRODUCTS & CHEMICALS, INC.,)
a Corporation,

Plaintiff,

VS.

MANUEL DURANT,

Defendant.

) IN THE CIRCUIT COURT OF

) MONTGOMERY COUNTY, ALABAMA

) AT LAW

) CASE NO. _____

)
Comes now the Defendant and appearing specially and only for
the purpose of this Plea in Abatement, files the following Plea in
Abatement:

That, at the time this suit was commenced, and for a period of
time in excess of ten (10) years prior to said date, the Defendant
was and has been a resident citizen of Bay Minette, Baldwin County,
Alabama; that he has never lived in Montgomery County; this Court
is without jurisdiction over said suit. The venue is improperly
laid in Montgomery County, and this cause of action should be
abated.

Manuel Durant
Manuel Durant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Manuel
Durant, who is known to me and who being by me first duly sworn
deposes and says: That he has read the foregoing Plea in Abatement
and that the matters set out therein are true and correct.

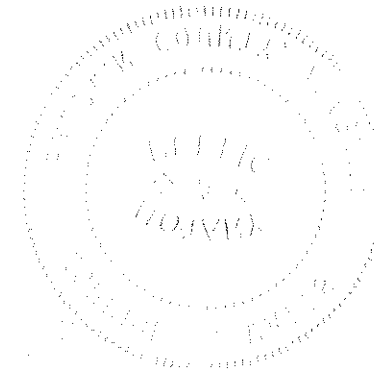
Manuel Durant
Manuel Durant

Sworn to and subscribed before me on this the 16th day of
September, 1971.

James L. Watts
Notary Public

Wilters & Brantley
P. O. Box 968
Bay Minette, Alabama
Attorneys for Defendant

28534



Filed in office this 17 day
of Sept, 1971.

John R. Mawhox Clerk

SPEED LETTER.

LAW OFFICES

10,052

TO Clerk of the Circuit Court
Baldwin County Court House
Bay Minette, Alabama

FROM MICHAEL T. BLACKER
SUITE 210, BELL BUILDING
MONTGOMERY, ALABAMA 36104

SUBJECT Air Products & Chemicals Inc. vs. Manuel Durant
—NO. 9 & 10 FOLD

Phone 205-262-5297

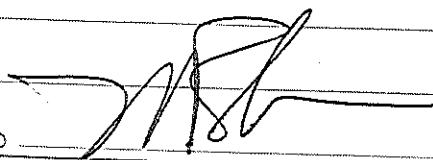
MESSAGE

DATE October 29 19 71

Dear Sir: The above suit was transferred to your county from the
Circuit Court of Montgomery County, Alabama, in September, 1971. Please
dismiss same and forward the cost bill to me. Thank you.

cc: T. M. Brantley, Esquire
P. O. Box 968
Bay Minette, Alabama 36507

SIGNED



REPLY

DATE _____ 19 _____

—NO. 9 FOLD

—NO. 10 FOLD

SIGNED _____