

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons C. Lenoir Thompson, Bay Minette, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, and answer, plead or demur within the time required by law, to the complaint of Kerr McGee Chemical Corporation, Inc., a Delaware Corporation.

Witness my hand this 9 day of November, 1971.

*Eunice B. Blackmon*  
Circuit Clerk

---

KERR McGEE CHEMICAL CORPORATION,  
INC., A Delaware Corporation, \* IN THE CIRCUIT COURT OF  
Plaintiff \* BALDWIN COUNTY, ALABAMA  
VS \* AT LAW  
C. LENOIR THOMPSON, \* CASE NO. 10-108  
Defendant \*

The Plaintiff claims of the Defendant the sum of Three Thousand, Eight Hundred, Seventy Five Dollars and eighty three cents (\$3,875.83), due from the Defendant on an account stated between the Plaintiff and the Defendant from the 19th day of June, 1968, until the 23rd day of September, 1971, which sum of money together with interest thereon is due and unpaid.

Plaintiff attaches hereto and makes a part hereof a verified account between the parties hereto, and alleges that Defendant has had continual knowledge thereof.

*J.W. Stokes*  
Attorney for Plaintiff

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

*J.W. Stokes*  
Attorney for Plaintiff

Plaintiff's Attorney:  
Jackson W. Stokes  
P. O. Box 356  
Elba, Alabama 36323

FILED

NOV 9 1971

EUNICE B. BLACKMON CIRCUIT CLERK

216127 003 01 02 18

CREDIT AMOUNT

NAME C. LENOIR THOMPSON  
 ADDRESS P. O. BOX 359  
 BAY MINETTE, ALA.

AMOUNT \_\_\_\_\_  
 DATE \_\_\_\_\_

A

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Jun 23 68				.00	
Jun 19 68	14772	342.90		342.90	
Jun 7 68	14771	580.46		923.36	
Jun 6 68	14770	237.48		1,160.84	
Jun 5 68	14769	916.51		2,077.35	
Jul 18 68	31828	118.50		2,195.85	
Jun 27 68	37627	478.40		2,674.25	
Jun 30 68	32477	31.25		2,705.50	
Aug 23 68	32599		79.56	2,625.94	
Nov 21 68	43057	172.50		2,798.44	
Nov 23 68	SC	26.26		2,824.70	
Dec 23 68	SC	26.52		2,851.22	
Jan 23 69	SC	26.79		2,878.01	
Feb 23 69	SC	27.06		2,905.07	
Mar 23 69	SC	27.33		2,932.40	
Apr 23 69	SC	27.60		2,960.00	
May 23 69	SC	27.88		2,987.88	
Jun 23 69	SC	28.15		3,016.03	
Jul 23 69	SC	30.16		3,046.19	
Aug 23 69	SC	30.46		3,076.65	
Sep 23 69	SC	30.77		3,107.42	
Oct 23 69	SC	31.08		3,138.50	
Nov 23 69	SC	31.38		3,169.88	
Dec 23 69	SC	31.70		3,201.58	
Jan 23 70	SC	32.02		3,233.60	
Feb 23 70	SC	32.34		3,265.94	
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Apr 23 70	SC	32.98		3,331.58	
May 23 70	SC	33.32		3,364.90	
Jun 23 70	SC	33.65		3,398.55	
Jul 23 70	SC	33.99		3,432.54	
Aug 23 70	SC	34.33		3,466.87	
Sep 23 70	SC	34.66		3,501.53	
Oct 23 70	SC	35.01		3,536.54	
Nov 23 70	SC	35.36		3,571.90	
Dec 23 70	SC	35.72		3,607.62	
Jan 23 71	SC	28.86		3,636.48	
Feb 23 71	SC	29.09		3,665.57	
Mar 23 71	SC	29.32		3,694.89	

ADDRESS

DATE \_\_\_\_\_

DATE	REFERENCE NUMBER	DEBIT	CREDIT	BALANCE	PROOF
Mar 23	Bal Forward			3,694.89	
Apr 23 71	SC	29.56		3,724.45	
May 23 71	SC	29.80		3,754.25	
Jun 23 71	SC	30.03		3,784.28	
Jul 23 71	SC	30.27		3,814.55	
Aug 23 71	SC	30.52		3,845.07	
Sep 23 71	SC	30.76		3,875.83	
State of Mississippi County of Hinds					
Personally appeared before me, the undersigned authority in and for said county, in said state, B. C. MILLER, who is known to me and who being by me first duly sworn, voluntarily deposes and says on oath as follows: That the within account against above debtor, in the amount of \$3,875.83 is justly due Kerr-McGee Chemical Corp., a corporation incorporated by and under the laws of the State of Delaware, of which corporation he is Regional Credit Manager, and that he has personal knowledge of the correctness of the same after the allowance of all credits to which such debtor is entitled.					
<i>B.C. Miller</i> of said Kerr-McGee Chemical Corp.					
Subscribed and sworn to me this 4th day of October, 1971.  <i>W. D. Edwards, Jr.</i> Notary Public					
My Commission Expires March 10, 1973					

KCR Doc#

T-211P



KERR-MCGEE CHEMICAL CORP

case # 10,108

KERR McGEE CHEMICAL CORPORATION,  
INC. A DELAWARE CORPORATION

T  
VS:

C. LENOIR THOMPSON

FED

NOV 9 1971

EUNICE B. BLACKMON

CIRCUIT  
CLERK

NOV 9 1971

TAYLOR WILKINS  
SHERIFF

Plaintiff's Attorney:  
Jackson W. Stokes  
P. O. Box 356  
Elba, Alabama 36323

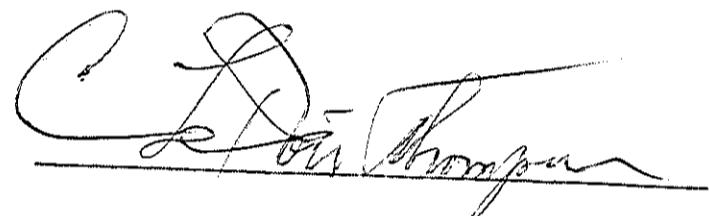
Received 9 Nov 1971  
and on 9 Nov 1971  
I served a copy of the within, J. W. Stokes  
C. Lenoir Thompson  
By service of Sheriff Taylor Wilkins  
Sheriff of Taylor Wilkins, Sheriff  
Ten Cents per mile Taylor Wilkins, Sheriff  
57 DEPUTY SHERIFF

KERR McGEE CHEMICAL CORPORATION \* IN THE CIRCUIT COURT OF  
INC., A Delaware Corporation, \* BALDWIN COUNTY, ALABAMA  
Plaintiff \* AT LAW  
vs \* CASE NO. 10,108  
C. LeNOIR THOMPSON \*  
Defendant \*\*

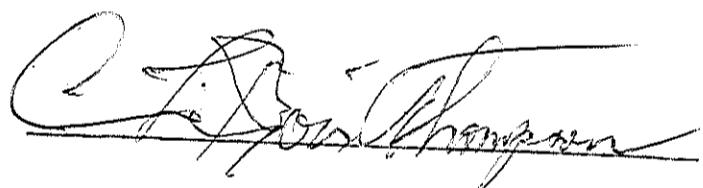
DEMURRER

Comes the Defendant in the above styled cause and  
for demurrer to said complaint alleges as follows:

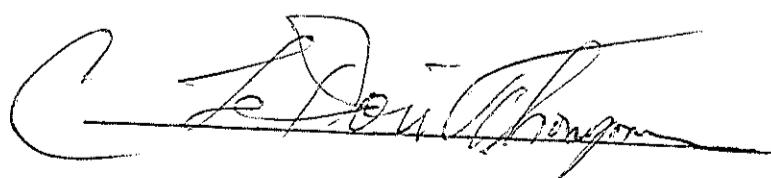
1. That said complaint fails to state a cause of action.
2. That said complaint alleges a "continual knowledge of certain facts on the part of the defendant".



Defendant demands trial by jury.



I hereby certify that I have this the 7 day of  
December, 1971, mailed postage prepaid a copy of the foregoing  
demurrer to Honorable Jackson W. Stokes, P. O. Box 356, Elba,  
Alabama 36323, Attorney for Plaintiff.



**FILED**

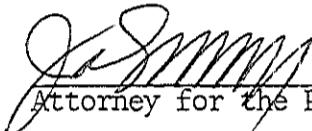
DEC 8 1971

EUNICE B. BLACKMON CIRCUIT CLERK

KERR McGEE CHEMICAL CORPORATION,  
INC., a Delaware Corporation,  
Plaintiff  
VS  
C. LeNOIR THOMPSON,  
Defendant

\* IN THE CIRCUIT COURT OF  
\* BALDWIN COUNTY, ALABAMA  
\* AT LAW  
\* CASE NO. 10,108  
\*

Comes now the plaintiff in the foregoing styled cause and would move the court for additional time in which to answer the interrogatories heretofore filed in this cause until the 17th day of February, 1972.

  
\_\_\_\_\_  
Attorney for the Plaintiff

O R D E R

Foregoing motion having been presented to the court this day and the same having been understood and considered by the court;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED BY THE COURT that the plaintiff in the foregoing styled cause is (is not) hereby granted additional time to answer the interrogatories heretofore filed in this cause until the 17th day of February 1972.

Done this 5<sup>th</sup> day of January, 1972.

J. Tolson J. Moulshburne  
Circuit Judge

**FILED**

JAN 6 1972

EUNICE B. BLACKMON CIRCUIT CLERK

KERR McGEE CHEMICAL CORPORATION,  
a corporation,

Plaintiff

VS

C. LENOIR THOMPSON,

Defendant

\* IN THE CIRCUIT COURT OF

\* BALDWIN COUNTY, ALABAMA

\* CASE NO. 10,108

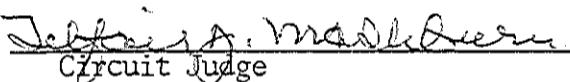
Comes now the plaintiff in the foregoing styled cause and moves  
the court to dismiss said cause with prejudice.

  
\_\_\_\_\_  
Attorney for the Plaintiff

O R D E R

Motion in the foregoing styled cause, having been submitted to  
the court this day and the same having been understood and considered.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the court  
that said motion is due to be and is hereby granted, and this cause is  
hereby dismissed with prejudice.

  
\_\_\_\_\_  
Circuit Judge

~~FILED~~  
~~MAR 3 1972~~  
~~EUNICE B. BLACKMON  
CIRCUIT CLERK~~

  
\_\_\_\_\_  
FILED

MAR 3 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

Book 13  
Page 6

100% 100% 100% 100% 100%

# Jackson W. Stokes

POST OFFICE BOX 356

TELEPHONE  
AREA CODE 205  
897-2894

ATTORNEY-AT-LAW

Elba, Alabama 36323

November 8, 1971

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

Re: Kerr McGee vs. Thompson, C. Lenoir

Dear Mrs. Blackmon:

Please file the enclosed summons and complaint in the above matter  
and advise when service has been perfected.

Thanking you and with my regards, I am,

Sincerely,

*J.W.S.*

Jackson W. Stokes

JWS/jp

10/10/71

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

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

KERR McGEE CHEMICAL CORPORATION, \* IN THE CIRCUIT COURT OF  
INC., A Delaware Corporation, \* BALDWIN COUNTY, ALABAMA.  
Plaintiff \*  
vs \* AT LAW  
C. LENOIR THOMPSON \* CASE NO. 10,108  
Defendant \*

Comes now the Defendant in the above styled cause and desiring the testimony of the Plaintiff propounds the following interrogatories to be answered separately and severally in the manner and form provided by law, viz:

1. State the name and address of the corporation.
2. State the name of the individual answering this interrogatory and show the official capacity in which said individual is employed by the Plaintiff in this cause.
3. State from the record the name of the person making delivery of the item alleged to have been sold on June 19, 1968, and where said item was delivered.
4. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item, on June 19, 1968.
5. If an analysis was made list the figures shown in this analysis, on June 19, 1968.
6. State from the record the name of the person making delivery of the item alleged to have been sold on June 7, 1968, and where said item was delivered.
7. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 7, 1968.
8. If an analysis was made list the figures shown in this analysis on June 7, 1968.
9. State from the record the name of the person making delivery of the item alleged to have been sold on June 6, 1968, and where said item was delivered.
10. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 6, 1968.

11. If an analysis was made list the figures shown in this analysis on June 6, 1968.
12. State from the record the name of the person making delivery of the item alleged to have been sold on June 5, 1968, and where said item was delivered.
13. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 5, 1968.
14. If an analysis was made list the figures shown in this analysis on June 5, 1968.
15. State from the record the name of the person making delivery of the item alleged to have been sold on June 18, 1968, and where said item was delivered.
16. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 18, 1968.
17. If an analysis was made list the figures shown in this analysis on June 18, 1968.
18. State from the record the name of the person making delivery of the item alleged to have been sold on June 27, 1968, and where said item was delivered.
19. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 27, 1968.
20. If an analysis was made list the figures shown in this analysis on June 27, 1968.
21. State from the record the name of the person making delivery of the item alleged to have been sold on June 30, 1968, and where said item was delivered.
22. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on June 30, 1968.
23. If an analysis was made list the figures shown in this analysis on June 30, 1968.
24. State from the record the name of the person making delivery of the item alleged to have been sold on August 23, 1968, and where said item was delivered.

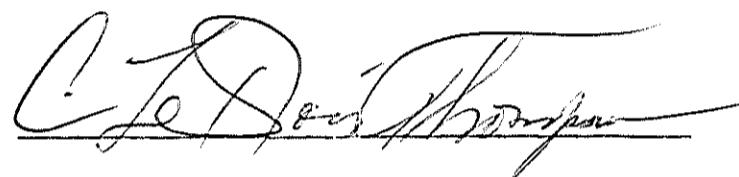
25. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on August 23, 1968.

26. If an analysis was made list the figures shown in this analysis on August 23, 1968.

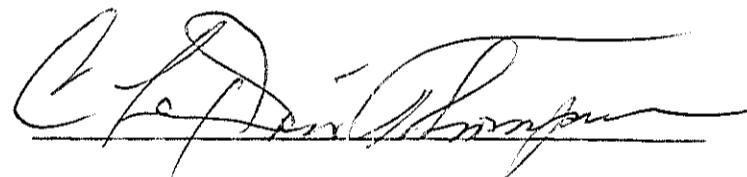
27. State from the record the name of the person making delivery of the item alleged to have been sold on November 21, 1968, and where said item was delivered.

28. State the name of the person taking the sample of the item alleged to have been sold and whether or not a test was made for the analysis of said item on November 21, 1968.

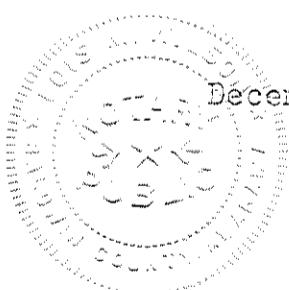
29. If an analysis was made list the figures shown in this analysis on November 21, 1968.



Your said Defendant says under oath that the answers to the said interrogatories will be material testimony for your said Defendant in this cause.



Sworn to and subscribed Before me this 7<sup>th</sup> day of December, 1971.



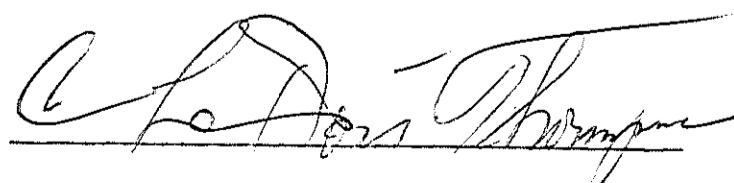
Lois M. Wilson  
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

I hereby certify that I have this the 7<sup>th</sup> day of December, 1971, mailed postage prepaid a copy of the foregoing interrogatories to Honorable Jackson W. Stokes, P. O. Box 356, Elba, Alabama 36323, Attorney for Plaintiff.

FILED

DEC 8 1971

EUNICE B. BLACKMON CIRCUIT CLERK



STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons C. Lenoir Thompson, Bay Minette, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, and answer, plead or demur within the time required by law, to the complaint of Kerr McGee Chemical Corporation, Inc., a Delaware Corporation.

Witness my hand this 9 day of November, 1971.

*Eunice B. Blackmon*  
Circuit Clerk

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KERR McGEE CHEMICAL CORPORATION, INC., A Delaware Corporation,	*	IN THE CIRCUIT COURT OF
	*	BALDWIN COUNTY, ALABAMA
Plaintiff	*	AT LAW
VS	*	CASE NO. <u>15,108</u>
C. LENOIR THOMPSON,	*	
Defendant	*	

The Plaintiff claims of the Defendant the sum of Three Thousand, Eight Hundred, Seventy Five Dollars and eighty three cents (\$3,875.83), due from the Defendant on an account stated between the Plaintiff and the Defendant from the 19th day of June, 1968, until the 23rd day of September, 1971, which sum of money together with interest thereon is due and unpaid.

Plaintiff attaches hereto and makes a part hereof a verified account between the parties hereto, and alleges that Defendant has had continual knowledge thereof.

*J.W. Stokes*  
Attorney for Plaintiff

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

*J.W. Stokes*  
Attorney for Plaintiff

Plaintiff's Attorney:  
Jackson W. Stokes  
P. O. Box 356  
Elba, Alabama 36323

FILED

NOV 9 1971

EUNICE B. BLACKMON CIRCUIT CLERK

216127 003 01 02 18

NAME            C. LENOIR THOMPSON  
 ADDRESS        P. O. BOX 359  
                 BAY MINETTE, ALA.

CREDIT AMOUNT

AMOUNT \_\_\_\_\_

DATE \_\_\_\_\_

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<i>B.C. Miller</i> of said Kerr-McGee Chemical Corp.					
Subscribed and sworn to me this 4th day of October, 1971. <i>Miss Susan Moore, Notary Public</i>					
My Commission Expires March 10, 1973					

KCB Paper

T-211P



KERR-MCGEE CHEMICAL CORP.