

TELEPHONE
AREA CODE 205
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

June 12, 1972

POST OFFICE BOX 356

Mrs. Eunice Blackmon
Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama

RE: Kerr McGee Chemical Corporation
VS: Bradford Brewer
Case No. 10290

Dear Miss Eunice:

I have been advised by Mr. Byrd in your Sheriff's office that the original complaint in this cause had been mislaid, and requested that I ask you to issue an alias Summons and Complaint. Enclosed herewith is an additional two copies of the Complaint in this cause for this purpose.

Thanking you and with my regards, I am,

Sincerely,

W. Stokes
Jackson W. Stokes

JWS:gs

Enclosures

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

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

FILED

MAR 15 1972

EUNICE B. BLACKMON
CIRCUIT CLERK

STATE OF ALABAMA

BALDWIN COUNTY

TO MY SHERIFF OF THE STATE OF ALABAMA, GREETINGS,

You are hereby commanded to summons BRADFORD BREWER, Route 1, Box 199-1, Robertsdale, 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, Inc., a corporation.

Witness my hand, this 13 day of March, 1972.

Eunice B. Blackmon
Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,
INC., a Corporation,

Plaintiff

VS

BRADFORD BREWER,

Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO. 10,290
*
*

COUNT 1

The Plaintiff claims of the Defendant the sum of THREE-THOUSAND, FOUR-HUNDRED, SIXTY-FOUR DOLLARS and NINE CENTS (\$3,464.09) for goods, merchandise, and chattels, sold to the Defendant by the Plaintiff from February 26, 1969 until January 23, 1972, which sum of money together with interest thereon, is due and unpaid.

COUNT 2

The Plaintiff claims of the Defendant the sum of THREE-THOUSAND, FOUR-HUNDRED, SIXTY-FOUR DOLLARS and NINE CENTS (\$3,464.09), on the account stated between the Defendant and the Plaintiff from the 26th day of February, 1969 until the 23rd day of January, 1972, which sum of money with interest thereon is due and unpaid.

[Signature]
Attorney for the Plaintiff

I acknowledge myself for security for the cost in this cause.

FILED

MAR 13 1972

[Signature]
Attorney for the Plaintiff

EUNICE B. BLACKMON
CIRCUIT
CLERK

Received 7-3 day of June 1972
and on 16 day of June 1972
I served a copy of the within to
on Bradford Brewer
By service on _____

TAYLOR WILKINS, Sheriff
By H. H. Brown D. S.
60 mi R T.
Elmore

Sheriff claims 60 miles at
Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff
BY Bradford Brewer
DEPUTY SHERIFF

Jackson W. Stokes
Alba.

EUNICE B. BLACKMON CIRCUIT
CLERK

TAYLOR WILKINS
SHERIFF

FILED

MAR 13 1972

JUN 13 1972

vs.
Bradford Brewer

Kerr M^o Lee Chemical
Corp. Inc.

10,290

I

KERR MCGEE CHEMICAL CORPORATION, INC.
a corporation

Plaintiff

Vs.

BRADFORD BREWER

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

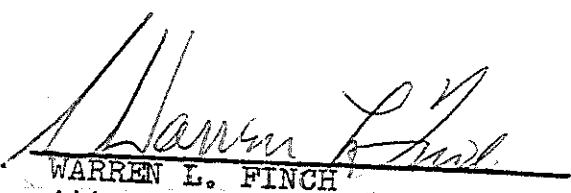
) AT LAW

) CASE NO. 10290

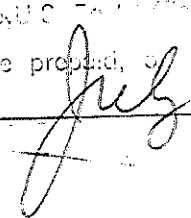
D E M U R R E R

Comes now the Plaintiff and Demurrers to each count
of the complaint separately and severally on the following
grounds:

1. For that the complaint does not set out a
good cause of action.


WARREN L. FINCH
Attorney for Plaintiff

I hereby certify that a copy of these pleadings
have been served on all parties by mailing
them in the U.S. Mail to the last properly address-
ed; postage prepaid, on this 13 day
of July, 1972


Warren L. Finch

FILED

JUL 13 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

KERR MCGEE CHEMICAL CORPORATION, INC. a corporation	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
Plaintiff	)	AT LAW
VS.	)	
BRADFORD BREWER	)	
Defendant	)	CASE NO. <u>10290</u>

A M E N D E D D E M U R R E R

Comes now the Defendant and Demurrers to each count of the complaint seperately and severally on the following grounds:

1. For that the complaint does not set out a good cause of action.

Warren L. Finch

 WARREN L. FINCH
 Attorney for Defendant

I hereby certify that a copy of these pleadings have been served on all parties by entering them in the U.S. Post Office, properly addressed, postage prepaid, on this 21 day of July, 1972

 Warren L. Finch

FILED

JUL 24 1972

EUNICE B. BLACKMON CIRCUIT CLERK

KERR MCGEE CHEMICAL CORPORATION,
INC., a corporation,

Plaintiff

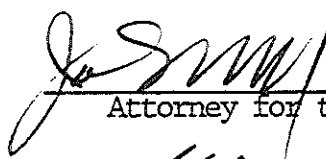
VS

BRADFORD BREWER,

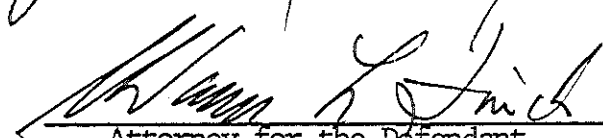
Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO. 10290
*
*
*

Comes now the attorneys for the parties in this cause and moves the Court for a continuance of this cause for and on account of the physical disability of the Attorney for the Plaintiff.



Attorney for the Plaintiff



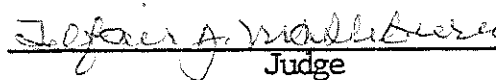
Attorney for the Defendant

O R D E R

Foregoing motion having been presented to the Court and the same having been considered;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED BY THE COURT, that the foregoing motion is hereby granted and this cause is continued until the next term of Court.

Done this 6th day of December, 1972,



Judge

FILED

DEC 6 1972

EUNICE B. BLACKMON CIRCUIT
CLERK