

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Henry A. King, Foley, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty days from service hereof and answer, plead or demur to the complaint of Kerr McGee Chemical Corporation, Inc., a corporation.

Witness my hand this 16 day of March, 1972.

*Ernie B. Blackmon*  
Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,  
INC., a corporation,

Plaintiff

VS

HENRY A. KING,

Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10,299  
\*  
\*

COUNT 1

The Plaintiff claims of the defendant the sum of Eight-Hundred, Three Dollars and Thirty Cents (\$803.30), due by promissory note made by the defendant on the 30th day of July, 1968, and due on the 23rd day of December, 1968, and plaintiff alleges that said sum, together with interest thereon, is due and unpaid.

Plaintiff further alleges that as a part of said note the defendant waived all benefits available to him under any homestead, execution or other exemption laws now or hereafter in effect in the State of Alabama.

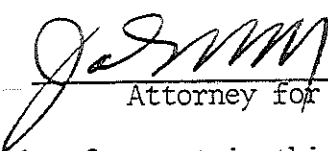
Plaintiff further alleges that as a part of said note, the defendant agreed to pay a reasonable attorney's fee and that such reasonable fee is ~~Two-Hundred and Fifty Dollars~~ (\$250.00).

COUNT 2

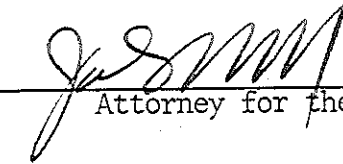
Plaintiff claims of the defendant the sum of Eight-Hundred, Fifty-Four Dollars and Sixty-Eight Cents (\$854.68), for goods, merchandise and chattells, sold to the defendant by the plaintiff from January 1, 1967, until the 23rd day of May, 1969, which sum of money, together with interest thereon, is due and unpaid.

COUNT 3

The Plaintiff claims of the defendant the sum of Eight-Hundred, Fifty-Four Dollars and Sixty-Eight Cents (\$854.68), on an account stated between the defendant and the plaintiff from the 1st day of January, 1967, until the 23rd day of May, 1969, which sum of money, together with interest thereon, is due and unpaid.

  
Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

  
Attorney for the Plaintiff

Plaintiff's Attorney

Jackson W. Stokes  
Attorney at Law  
P. O. Box 356  
Elba, Alabama 36323

**FILED**

MAR 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

Sheriff claims 72 Files 24  
Ten Cents per mile Total \$ 734  
TAYLOR WILKINS, Sheriff  
BY John W. King  
DEPUTY SHERIFF

Received 16 day of March 1972  
and on 23 day of March 1972  
I served a copy of the within  
on Henry A. King

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
BY Carlie Johnson D.S.

10,299

Kerr-McGee Chemical  
Corp. <sup>Inc.</sup> a Corp.

vs.

Henry A. King

FILED

MAR 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

MAR 16 1972

SHERIFF

Jackson W. Stokes

TELEPHONE  
AREA CODE 205  
897-2894

Jackson W. Stokes

ATTORNEY-AT-LAW

Elba, Alabama 36323

March 15, 1972

POST OFFICE BOX 356

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

Re: Kerr McGee Chemical Corporation  
Vs: Henry A. King 10,299

Dear Mrs. Blackmon:

Enclosed herewith is the original and two copies of the complaint in the foregoing styled cause. Please file same and hand to the Sheriff for service. When service is perfected, I would appreciate your advising as to the date.

Thanking you and with my regards, I am,

Sincerely,

*Bill*

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

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Henry A. King, Foley, Alabama, to be and appear before the Circuit Court of Baldwin County, Alabama, within thirty days from service hereof and answer, plead or demur to the complaint of Kerr McGee Chemical Corporation, Inc., a corporation.

Witness my hand this \_\_\_\_ day of March, 1972.

Circuit Clerk

KERR MCGEE CHEMICAL CORPORATION,  
INC., a corporation,

Plaintiff

VS

HENRY A. KING,

Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10299  
\*  
\*

COUNT 1

~~The Plaintiff claims of the defendant the sum of Eight-Hundred,~~  
Three Dollars and Thirty Cents (\$803.30), due by promissory note made by the defendant on the 30th day of July, 1968, and due on the 23rd day of December, 1968, and plaintiff alleges that said sum, together with interest thereon, is due and unpaid.

Plaintiff further alleges that as a part of said note the defendant waived all benefits available to him under any homestead, execution or other exemption laws now or hereafter in effect in the State of Alabama.

Plaintiff further alleges that as a part of said note, the defendant agreed to pay a reasonable attorney's fee and that such reasonable fee is Two-Hundred and Fifty Dollars (\$250.00).

COUNT 2

Plaintiff claims of the defendant the sum of Eight-Hundred, Fifty-Four Dollars and Sixty-Eight Cents (\$854.68), for goods, merchandise and chattells, sold to the defendant by the plaintiff from January 1, 1967, until the 23rd day of May, 1969, which sum of money, together with interest thereon, is due and unpaid.

COUNT 3

The Plaintiff claims of the defendant the sum of Eight-Hundred, Fifty-Four Dollars and Sixty-Eight Cents (\$854.68), on an account stated between the defendant and the plaintiff from the 1st day of January, 1967, until the 23rd day of May, 1969, which sum of money, together with interest thereon, is due and unpaid.

---

Attorney for the Plaintiff

I acknowledge myself as security for cost in this cause.

---

Attorney for the Plaintiff

Plaintiff's Attorney

Jackson W. Stokes  
Attorney at Law  
P. O. Box 356  
Elba, Alabama 36323

**FILED**

MAR 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

# Jackson W. Stokes

TELEPHONE  
AREA CODE 205  
897-2894  
OR 897-6824

ATTORNEY-AT-LAW  
Elba, Alabama 36323  
November 30, 1972

POST OFFICE BOX 356  
STOKES BUILDING  
105 SOUTH COURT STREET

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

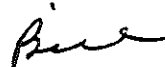
Re: Kerr McGee Chemical Corp.  
Vs: Henry A. King  
Case No. 10299

Dear Miss Eunice:

Enclosed herewith is a motion for a default judgment in the foregoing styled cause and which I would appreciate your handing to Judge Mashburn for a judgment. When this is done, please forward to me at your earliest convenience this Certificate of Judgment.

Thanking you and with my regards, I am,

Sincerely,



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

KERR MCGEE CHEMICAL CORPORATION,  
INC., a corporation,

Plaintiff

VS

HENRY A. KING,

Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10299  
\*  
\*

Comes now, Jackson W. Stokes, as Attorney for the Plaintiff,  
in the foregoing styled cause and would move the Court for a default  
judgment in this cause as follows:

Petitioner alleges that the amount due in this cause arose from  
a promissory note and an open account and alleges that the total  
amount due on said note was \$1,657.98. Petitioner further alleges  
that since service of said suit on Defendant on March 23, 1972, that  
the Defendant has paid the sum of \$400.00 and that there is now due  
and payable on said note and account is \$1,257.98.

Petitioner now moves the Court for a judgment in this cause  
in the amount of \$1,257.98.

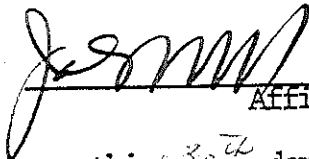


Attorney for the Plaintiff

STATE OF ALABAMA


COFFEE COUNTY

Before me, the undersigned authority, personally appeared Jackson  
W. Stokes, known to me to be the Attorney for Kerr McGee Chemical  
Corporation, who, being by me first duly sworn doth depose and say that  
the matters and things stated in the foregoing petition, are true as  
stated therein.



Affiant

Sworn to and subscribed before me this 30<sup>th</sup> day of November, 1972.



Notary Public



KERR MCGEE CHEMICAL CORPORATION,  
INC., a corporation,

Plaintiff

VS

HENRY A. KING,

Defendant

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* AT LAW  
\*  
\* CASE NO. 10299  
\*  
\*

Comes now, Jackson W. Stokes, as Attorney for the Plaintiff,  
in the foregoing styled cause and would move the Court for a default  
judgment in this cause as follows:

Petitioner alleges that the amount due in this cause arose from  
a promissory note and an open account and alleges that the total  
amount due on said note was \$1,657.98. Petitioner further alleges  
that since service of said suit on Defendant on March 23, 1972, that  
the Defendant has paid the sum of \$400.00 and that there is now due  
and payable on said note and account is \$1,257.98.

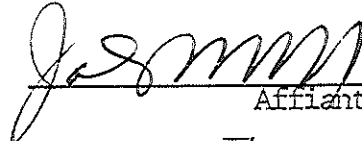
Petitioner now moves the Court for a judgment in this cause  
in the amount of \$1,257.98.

  
Attorney for the Plaintiff

STATE OF ALABAMA

COFFEE COUNTY

Before me, the undersigned authority, personally appeared Jackson  
W. Stokes, known to me to be the Attorney for Kerr McGee Chemical  
Corporation, who, being by me first duly sworn doth depose and say that  
the matters and things stated in the foregoing petition, are true as  
stated therein.

  
Affiant

Sworn to and subscribed before me this 30<sup>th</sup> day of November, 1972.

  
Notary Public