

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI

JUN 18 2012

GEORGIA PACIFIC

BARBARA DUNN, CIRCUIT CLERK
BY [Signature] D.C.

PLAINTIFF

VS.

CAUSE NO. 12-2530

MISSISSIPPI PRODUCTS INC

DEFENDANT(S)

COMPLAINT

Plaintiff files suit against Defendant(s) for the following reasons:

1. Defendant(s), can be served the following locations:

MISSISSIPPI PRODUCTS INC (SEE SUMMONS)
2457 VALLEY ST
JACKSON MS 39204

2. Defendant(s) purchased goods and/or services on open account from plaintiff. A copy of the invoices and/or statement of account is attached hereto as Exhibit "1".

3. Defendant(s) has failed to pay for these goods and/or services. Plaintiff made written demand for payment thirty days prior to filing this action. Defendant(s) have not made any payment since the notice. A copy of the written demand is attached as Exhibit "2".

4. Defendant(s) owe(s) plaintiff \$74,518.13 on the open account. Pre-judgment interest from 12/27/2011 at the rate of 8.0000% has accrued in the amount of \$2,645.90. Prejudgment interest continues to accrue.

5. Defendant(s) owe(s) plaintiff its reasonable attorneys' fees pursuant Mississippi law.

WHEREFORE, PREMISES CONSIDERED, plaintiff demands judgment against the Defendant(s), for \$74,518.13, plus accrued pre-judgment interest, post judgment interest, reasonable attorney fees and all court costs.

DATED: June 6, 2012.

Respectfully submitted,

GEORGIA PACIFIC

By:


Stephen E. Gardner

Stephen E. Gardner
MS Bar No. 4749
YoungWilliams P.A.
P. O. Box 23059
Jackson, Mississippi 39225-3059
Telephone: (601)-948-6100

Georgia-Pacific



CONFIDENTIAL CREDIT APPLICATION

GP 13 (03/99)

FULL LEGAL NAME OF BUSINESS (APPLICANT) <u>Mississippi Products, Inc</u>		DATE <u>1-9-04</u>	INTERNET ADDRESS <u>WWW.MSPRODUCTS.COM</u>
ADDRESS <u>2457 Valley Street</u>		PHONE <u>601-502-1481</u>	FAX <u>601-502-1484</u>
CITY <u>Jackson</u>	STATE <u>MS</u>	ZIP <u>39204</u>	E-MAIL ADDRESS <u>loretta.dixon@msproducts.com</u>
TAX STATUS: TAXABLE <input type="checkbox"/> EXEMPT <input checked="" type="checkbox"/>	DATE AND STATE OF ORGANIZATION <u>1992 Mississippi</u>		
NATURE OF BUSINESS <u>Wholesale Distributors</u>		DUNS NO.	
FEDERAL TAX ID NO. <u>64-0830599</u>		TYPE OF BUSINESS <input checked="" type="checkbox"/> CORP <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> OTHER	
SECTION A: NAMES AND TITLE OF OFFICERS, PARTNERS OR OTHER		SECTION B: ONLY COMPLETE IF NOT A CORPORATION	
John H Lee		SOCIAL SECURITY NO.	
Jean Lee		RESIDENTIAL ADDRESS	
		<u>One Summerwood Drive Jackson MS 39208</u>	
		<u>One Summerwood Drive Jackson MS 39208</u>	
ACCOUNTS PAYABLE CONTACT <u>Loretta Dixon</u>		ESTIMATED MONTHLY CREDIT REQUIREMENTS FROM GEORGIA-PACIFIC <u>\$ 150,000.00</u>	
TO SUPPORT THIS APPLICATION FOR CREDIT, PLEASE ATTACH LATEST FISCAL YEAR END FINANCIAL STATEMENT			
BANK NAME <u>Trustmark National Bank</u>		PHONE <u>601-825-1897</u>	
ADDRESS <u>Post Office Box 66</u>		FAX	
CITY <u>Brandon</u>	STATE <u>MS</u>	ZIP <u>39043</u>	PERSON TO CONTACT <u>Lisa Wilson</u>
TYPE OF BANK ACCOUNT <u>Commercial Checking</u>		ACCOUNT NUMBER <u>0116304701</u>	LOAN NUMBER <u>0010101913</u>
ACCOUNTING FIRM <u>Graham Poole</u>		PHONE <u>601-957-5050</u>	<input type="checkbox"/> REVOLVER <input type="checkbox"/> TERM <input type="checkbox"/> SECURED <input type="checkbox"/> UNSECURED
BUSINESS REFERENCES: (OTHER THAN GEORGIA-PACIFIC)			
NAME <u>Lagasse</u>		PHONE <u>800-989-7487</u>	
ADDRESS <u>P.O. Box 676572</u>		FAX <u>504-891-5220</u>	
CITY <u>Dallas, TX</u>	STATE <u>TX</u>	ZIP <u>75267</u>	PERSON TO CONTACT <u>Linda</u>
NAME <u>Marks Paper Company</u>		PHONE <u>504-832-1801</u>	
ADDRESS <u>1801 L & A Road</u>		FAX <u>504-835-3413</u>	
CITY <u>Metairie</u>	STATE <u>LA</u>	ZIP <u>70001</u>	PERSON TO CONTACT <u>Neal</u>
NAME <u>Heritage Bag</u>		PHONE <u>800-849-6503</u>	
ADDRESS <u>P.O. Box 841072</u>		FAX <u>972-241-8867</u>	
CITY <u>Dallas</u>	STATE <u>TX</u>	ZIP <u>75284-1072</u>	PERSON TO CONTACT
The above information is being submitted for the purpose of allowing Georgia-Pacific to assess and/or continue to assess credit solely for business purposes of the applicant. The applicant hereby represents and warrants that the information contained herein, or submitted in connection herewith, is true and complete as of the date hereof. The applicant hereby authorizes Georgia-Pacific to contact and investigate the references, including the banks, listed above and hereby authorizes the references to release the requested information. The applicant hereby agrees to remit payment within the terms specified on the face of each invoice. If payment is not received when due, the applicant also agrees to pay a monthly service charge equal to one and one half percent (1 1/2%) or the maximum amount allowable under applicable state law, of the unpaid delinquent balance until the account is paid in full. If the account is placed for collection, the applicant agrees to pay all costs and expenses of collection, including reasonable attorneys' fees and expenses.			
NAME (PLEASE PRINT) <u>Jonathan Lee</u>		AUTHORIZED OFFICER'S SIGNATURE REQUIRED <u>Jonathan Lee</u>	
TITLE <u>Marketing Manager</u>			

RETURN ORIGINAL TO:

AND FAX A COPY TO

G-P DIVISION



Georgia-Pacific

Statement of Account
Mississippi Products, Inc.
2457 Valley St
Jackson, MS 39204

Account #: 106903					
Inv Date	Invoice	Due Date	Inv Amt	Credit Memo/Payments	Net Amount Due
5/29/2011	98403035	6/29/2011	\$ 64,515.75	\$ 46,814.17	\$ 17,701.58
7/3/2011	98476156	8/4/2011	\$ 63,439.00	\$ -	\$ 63,439.00
9/8/2011	98612199	9/8/2011	\$ -	\$ 6,622.45	\$ (6,622.45)
					\$ -
	GRAND TOTAL DUE		\$ 127,954.75	\$ 53,436.62	\$ 74,518.13



YOUNG WILLIAMS P.A.

Attorneys at Law
210 East Capitol Street
Suite 2000
Jackson, Mississippi 39201
Post Office Box 23059
Jackson, Mississippi 39225-3059
Telephone 601.948.6100
Fax 601.355.6136
www.youngwilliams.com

J. Wesley Daughdrill, Jr.

Sean Wesley Ellis

Kenneth D. Farmer

Stephen E. Gardner

Don H. Goode

Robert L. Holladay, Jr.

Jay M. Kilpatrick

J. Scott Magee

Frank E. McRae, III

James H. Neeld, III

James H. Neeld, IV

Robert E. Sanders

Robert L. Wells

E. Stephen Williams

James Leon Young,

Of Counsel

J. Will Young,

1906-1996

Tony Carlisle,

Administrator

January 5, 2012

MISSISSIPPI PRODUCTS INC
2457 VALLEY ST
JACKSON MS 39204

RE: GEORGIA PACIFIC Indebtedness
Amount owed: \$74,518.13

Your account with GEORGIA PACIFIC, has been turned over to this office for collection. You are indebted to GEORGIA PACIFIC in the amount of \$74,518.13. A statement of account and/or invoices of this account are enclosed.

Pursuant to Miss. Code Ann. § 11-53-81, if you fail to pay this account in full within thirty (30) days of the date of this notice, legal action will be taken and you will also be liable for reasonable attorney's fees for collection of this debt. You should send your payment to me at the address below.

To discuss payment arrangements, please call 601-360-9001.

Sincerely yours,

Stephen E. Gardner
Enclosure



YOUNG WILLIAMS P.A.

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Robert E. Sanders

Robert L. Wells

E. Stephen Williams

Of Counsel

James H. Neeld, III

James Leon Young

J. Will Young

1906-1996

Tony Carlisle

Administrator

June 6, 2012

Circuit Clerk
COUNTY COURT OF HINDS
P.O. BOX 327
JACKSON MS 39205

Dear Court Clerk:

Please file the enclosed complaint and return the copies and issued summonses to us.
Our filing fees are enclosed.

Sincerely yours,

Stephen E. Gardner
Enclosures



YOUNG WILLIAMS P.A.

Attorneys at Law

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1906-1996

Tony Carlisle

Administrator

July 6, 2012

**HINDS COUNTY CIRCUIT CLERK
P.O. BOX 327
JACKSON, MS 39205**

**Re: GEORGIA PACIFIC
VS
MISSISSIPPI PRODUCTS INC**

HINDS COUNTY COURT CAUSE NO~ 251-12-2530COV

To whom it may concern:

Please find enclosed the original and one (1) copy of the executed "SUMMONS" in the above referenced matter. Please file the original and return to me the stamped "filed" copy. I have enclosed a self-addressed stamped envelope for your convenience.

If you have any questions in this regard, please do not hesitate to call me at the number below. Thank you for your assistance in this matter.

Sincerely,

Melanie Higgins

MDH
Paralegal for Stephen Gardner
Enclosures

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY, MISSISSIPPI

GEORGIA PACIFIC

PLAINTIFF

VS.

CAUSE NO 251-12-253069

MISSISSIPPI PRODUCTS INC

DEFENDANT(S)

SUMMONS

TO THE SHERIFF OR PROCESS SERVER:
YOU ARE COMMANDED TO SERVE:

MISSISSIPPI PRODUCTS INC

AGENT: DAVE M WHITE OR JONATHAN J LEE
52 FREEHILL 1125 MARTINGALE DR
BRANDON MS 39042 JACKSON MS 39206

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

UNLESS YOU DISPUTE THE VALIDITY OF THE DEBT WITHIN THIRTY (30) DAYS FROM THE RECEIPT OF THIS NOTICE, THE DEBT WILL BE PRESUMED TO BE VALID, IF YOU NOTIFY US WITHIN THIRTY (30) DAYS THAT THE DEBT OR ANY PORTION OF IT IS DISPUTED, WE WILL MAIL VERIFICATION OF THE DEBT TO YOU. ALSO, UPON YOUR REQUEST WE WILL PROVIDE YOU THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF THE ORIGINAL CREDITOR IS DIFFERENT FROM THE CURRENT ONE.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Stephen E. Gardner YoungWilliams P.A. and whose street address is 2000 Regions Plaza, Jackson, Mississippi, 39201. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 18 day of June, 12.

Circuit Clerk

By: [Signature] D.C.

Stephen E. Gardner
Mississippi Bar No. 4749
YoungWilliams P.A.
P. O. Box 23059
Jackson, Mississippi 39225-3059
(601) 948-6100

FILED

PROOF OF SERVICE - SUMMONS

JUL 09 2012

ms. Products Inc. / Jonathan Lee
 Name of Person or Entity served (PROCESS SERVER)

BARBARA DUNN, CIRCUIT CLERK

BY Jonathan Lee

I, the undersigned process server, served the Summons and Complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

() FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid) copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender. (Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B).

(X) PERSONAL SERVICE. I personally delivered copies to Jonathan J. Lee on the 1st day of July, 2012, where I found said person in Hinds County of the State of Mississippi. (Agent of Process: _____)

() RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within _____ County of the State of Mississippi. I served the Summons and Complaint on the _____ day of _____, 2012, at the usual place of abode of said person by leaving a true copy of the Summons and Complaint with _____ who is the _____ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the Summons and Complaint, and thereafter, on the _____ day of _____, 2012, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

() CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or other evidence of actual delivery to the person served.)

() I was unable to serve the summons and complaint.

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ 50 x 2 = 100⁰⁰

Process server must list below: (Please print or type)

Name: Craig Wells
 Address: P.O. Box 4404
Breiden, MS 39047
 Telephone: (601) 540-0051

6/23 - (Saturday) 52 Freehill Ct. - def. has not lived here in over 13 yrs. per current res. 9302m
 7/1 - served Jonathan Lee 2025 Monticane Dr (Sunday) 2pm

Signature: [Signature]
 (Personal / Residence Service)

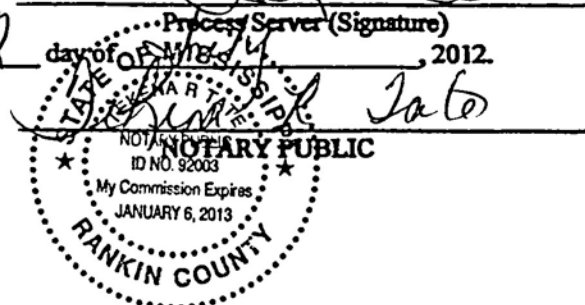
STATE OF MISSISSIPPI:
 COUNTY OF RANKIN:

PERSONALLY APPEARED BEFORE ME THE UNDERSIGNED AUTHORITY is and for the state and county aforesaid, the within named Craig Wells who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service Summons" are true and correct as therein stated.

SWORN TO AND SUBSCRIBED before me, this the 2 day of July, 2012.

MY COMMISSION EXPIRES:

01/06/2013



HINDS COUNTY CIRCUIT COURT
P.O. BOX 327
JACKSON, MS 39205

GEORGIA PACIFIC

FILED

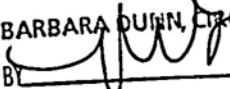
PLAINTIFF

VS.

SEP 07 2012

NO. 251-12-2530-COV

MISSISSIPPI PRODUCTS, INC

BARBARA DUINN, CIRCUIT CLERK
BY  D.C.

DEFENDANT

TRUSTMARK NATIONAL BANK

GARNISHEE

ANSWER TO GARNISHMENT

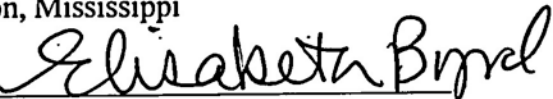
AND NOW COMES THE SAID GARNISHEE by Elisabeth Byrd, Assistant Vice President, who has been summoned to answer a Writ of Garnishment in the above styled cause, and answering, say that:

It is indebted to said Defendant in the sum of NONE.

That it has none other effect of said Defendants in its hands, nor did it have at the time of such summons; nor has it had since that time. That is known of no other person or persons who are indebted to said Defendant, or who have any of his effects in their hands. That is has no knowledge or belief of any other persons having effects of said defendant in their possession or under their control.

TRUSTMARK NATIONAL BANK
Jackson, Mississippi

BY:



Elisabeth Byrd

Vice President & Legal Officer

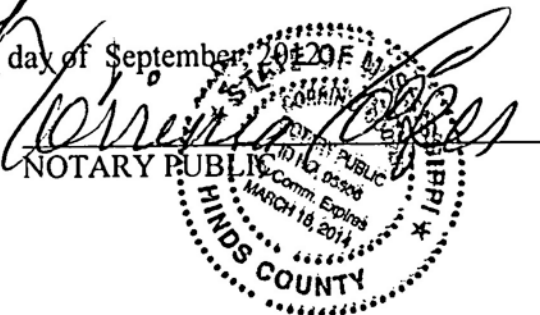
SWORN TO and subscribed this the

5th

day of September, 2012

NOTARY PUBLIC

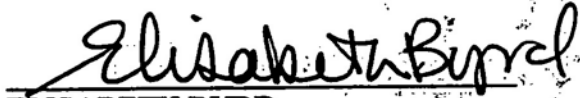
OF COUNSEL:
ELISABETH BYRD
TRUSTMARK NATIONAL BANK
LEGAL DEPARTMENT
P. O. BOX 291
JACKSON, MS 39205



CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the attached was mailed to: Stephen E.

Gardner, P.O. Box 23059, Jackson, MS 39225-3059 on the 5th day of September
2012.



ELISABETH BYRD

Vice President & Legal Officer



Post Office Box 291
Jackson, MS 39205-0291
(601) 208-5088 PHONE
www.trustmark.com

September 05, 2012

Hinds County Circuit Court
P.O. Box 327
Jackson, MS 39205

RE: Georgia Pacific vs Mississippi Products, Inc
No. 251-12-2530-COV

Dear Sir:

Enclosed herewith is the original and one photocopy of our Answer of Garnishee--
Defendant, Trustmark National Bank, Jackson, Mississippi, to be filed in the above styled
and numbered cause. Please file the original, mark the copy "Filed", date and return in the
enclosed self-addressed envelope.

Sincerely,

Elisabeth Byrd
Vice President
Legal Officer

EB/ckc

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI

GEORGIA PACIFIC

FILED

PLAINTIFF

VS.

AUG 30 2012

NO. 251-12-2530-COV

MISSISSIPPI PRODUCTS INC

BARBARA DUNN, CIRCUIT CLERK

DEFENDANT(S)

TRUSTMARK NATIONAL BANK

BY 

GARNISHEE-DEFENDANT

SUGGESTION FOR WRIT OF GARNISHMENT

The undersigned attorney for the plaintiff in the above-styled cause respectfully shows that a final judgment was rendered in favor of the plaintiff against the defendant(s). The current balance owed under this judgment is \$79,738.13. Interest continues to accrue. That an execution may be issued upon said judgment; and that, **TRUSTMARK NATIONAL BANK** garnishee-defendant herein, whose agent for service of process is **ANY OFFICER OR BANK TELLER, 248 E CAPITOL ST, JACKSON MS 39201-2502** is indebted to defendant(s), possesses effects of and/or knows of some other person who is indebted to defendant(s), or possesses effects of defendant(s).

Plaintiff demands that any indebtedness of **TRUSTMARK NATIONAL BANK** to defendants, at the time of service of process therefore, be bound by and subject to the lien of the judgment including post judgment interest and court costs and further that it be appropriated to the satisfaction of the judgment with payments to be applied to accrued interest first then to principal until the entire principal balance is paid.

Further, plaintiff demands judgment against the garnishee-defendant, **TRUSTMARK NATIONAL BANK**, in the sum of \$79,738.13 plus post judgment interest and all court costs.

DATED: August 23, 2012.

BY:


GEORGIA PACIFIC
Stephen E. Gardner

Stephen E. Gardner
Mississippi Bar No. 4749
Young Williams P.A.
P. O. Box 23059
Jackson, MS 39225-3059
(601) 948-6100



YOUNG WILLIAMS P.A.

Attorneys at Law
210 East Capitol Street
Suite 2000
Jackson, Mississippi 39201
Post Office Box 23059
Jackson, Mississippi 39225-3059
Telephone 601.948.6100
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J. Will Young

1906-1996

Tony Carlisle

Administrator

August 23, 2012

CIRCUIT COURT CLERK
HINDS COUNTY COURT
P.O. BOX 327
JACKSON MS 39205

RE: Cause No: 251-12-2530-COV

Dear Court Clerk:

Please file the enclosed and return the copies and issued writs to us. Our filing fees are enclosed.

Sincerely yours,

Stephen E. Gardner
Enclosures

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS
COUNTY MISSISSIPPI

GEORGIA PACIFIC

FILED

PLAINTIFF

VS.

AUG 14 2012
BARBARA DUNN, CIRCUIT CLERK
BY [Signature] D.C.

NO. 251-12-2530-COV

MISSISSIPPI PRODUCTS INC

DEFENDANT(S)

**APPLICATION TO CLERK FOR ENTRY OF DEFAULT AND
SUPPORTING AFFIDAVIT AND AFFIDAVIT ON ATTORNEY'S FEES**

PURSUANT to Rule 55, M.R.C.P., the clerk is requested to enter default
against the Defendant(s) in the above styled action for failure to plead, answer or otherwise
defend as set out in the affidavit attached hereto as Exhibit "A".

DATED: August 13, 2012.

Respectfully submitted,

GEORGIA PACIFIC

By:

[Signature]

Stephen E. Gardner

Stephen E. Gardner
MS Bar No. 4749
Young Williams, P.A.
P. O. Box 23059
Jackson, Mississippi 39225-3059
Telephone: (601) 948-6100

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF HINDS

Stephen E. Gardner, being duly sworn, deposed and says:

1. That he is attorney of record for the Plaintiff, and has personal knowledge of the facts set forth in this Affidavit.
2. That the Defendant(s) was/were duly served with summons and complaint.
3. That more than thirty (30) days have elapsed since the date on which the said Defendant(s) was/were served with summons and complaint.
4. That the Defendant(s) have failed to answer or otherwise defend as to Plaintiff's complaint or serve a copy of any answer or other defense which they might have upon the undersigned attorney of record for the Plaintiff.
5. This Affidavit is executed in accordance with Rule 55(a) of the Mississippi Rules of Civil Procedure, for the purpose of enabling the Plaintiff to obtain an entry of default against the Defendant(s) for their failure to answer or otherwise defend as to Plaintiff's complaint.

Respectfully submitted,

GEORGIA PACIFIC

By: _____

Stephen E. Gardner

SWORN TO AND SUBSCRIBED BEFORE ME, this the 13th day of

Aug., 2012.

Notary Public
My Commission Expires:



EXHIBIT "A" AFFIDAVIT



YOUNG WILLIAMS P.A.

Attorneys at Law
210 East Capitol Street
Suite 2000
Jackson, Mississippi 39201
Post Office Box 23059
Jackson, Mississippi 39225-3059
Telephone 601.948.6100
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J. Will Young

1906-1996

Tony Carlisle

Administrator

August 13, 2012

CIRCUIT COURT CLERK
P.O. BOX 327
JACKSON MS 39205

Dear COURT CLERK:

Please file the enclosed pleading and return the copies to us.

Sincerely yours,

Stephen E. Gardner
Enclosures

STATE OF MISSISSIPPI
COUNTY OF HINDS

I Stephen E. Gardner , state under oath that:

1. I am executing this affidavit to support reasonable attorney's fees in this case.
2. I am an attorney licensed to practice law in the State of Mississippi.
3. I have handled numerous collection cases. In my opinion and based upon the Mississippi Supreme Court ruling in Dynasteel Corporation v. Aztec Industries, Inc., Cause No. 90-CA-85 (December 31, 1992), \$5000.00 is a reasonable attorney's fee in this matter, particularly in light of the fact that significant post-judgment attorney's fees are likely to be incurred by plaintiff in pursuit of the defendant(s) and in the collection of the debt.
4. The above and foregoing represents my opinion regarding attorney's fees to be awarded in this case and I am competent to testify to the same.

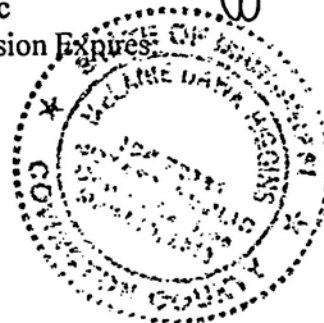

Stephen E. Gardner

SWORN TO AND SUBSCRIBED BEFORE ME, this the 13th day of

Aug 2012.


Notary Public
My Commission Expires

"EXHIBIT B"



IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS
COUNTY MISSISSIPPI

GEORGIA PACIFIC

FILED

PLAINTIFF

AUG 14 2012

VS.

BARBARA D. JONES, CIRCUIT CLERK

NO. 251-12-2530-COV

BY [Signature] D.C.

MISSISSIPPI PRODUCTS INC

DEFENDANT(S)

DOCKET OF ENTRY OF DEFAULT

Default entered against the Defendant(s) this the 14 day of

Aug, 2012.

CIRCUIT CLERK

By:

[Signature]
Deputy Clerk

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI

GEORGIA PACIFIC

PLAINTIFF

VS.

FILED

Cause No: 251-12-2530-COV

MISSISSIPPI PRODUCTS INC

AUG 17 2012

DEFENDANT(S)

BARBARA DUNN, CIRCUIT CLERK

BY DEFAULT JUDGMENT


THIS CAUSE came on for hearing this day on the application of the Plaintiff for a default judgment pursuant to Rule 55, M.R.C.P., against the Defendant(s) and the Defendant(s) having been duly served with the summons and Complaint and not being an infant or unrepresented and incompetent person and having failed to plead or otherwise defend and Defendant(s)' default having been duly entered and docketed by the clerk of this Court, and the Defendant(s) having taken no proceeding since the default was entered this Court is of the opinion that the Plaintiff is entitled to a judgment against the Defendant(s).

IT IS, THEREFORE, ORDERED AND ADJUDGED that GEORGIA PACIFIC, be awarded a judgment against defendant(s) in the sum of \$74,518.13, accrued interest in the amount of \$3,756.53, post judgment interest from the date of this judgment at the rate of 8.0000%, attorney fees in the amount of \$5,000.00 and court costs for all of which let execution issue.

SO ORDERED AND ADJUDGED this the 16th day of Aug, 2012


JUDGE

102
433634
SUBMITTED:


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October 4, 2012

**HINDS COUNTY CIRCUIT CLERK
P.O. BOX 327
JACKSON, MS 39205**

J. Wesley Daughdrill, Jr.

Sean Wesley Ellis

Kenneth D. Farmer

Stephen E. Gardner

Don H. Goode

Jay M. Kilpatrick

J. Scott Magee

Frank E. McRae, III

James H. Neeld, IV

J. Andrew Payne

Robert E. Sanders

Robert L. Wells

E. Stephen Williams

**Re: GEORGIA PACIFIC
VS
MISSISSIPPI PRODUCTS**

HINDS COUNTY COURT CAUSE NO~ 251-12-2530-COV

To whom it may concern:

Please find enclosed the original and one (1) copy of the executed "WRIT" in the above referenced matter. Please file the original and return to me the stamped "filed" copy. I have enclosed a self-addressed stamped envelope for your convenience.

If you have any questions in this regard, please do not hesitate to call me at the number below. Thank you for your assistance in this matter.

Sincerely,

Tammie Lloyd

TML
Paralegal for Stephen Gardner
Enclosures

Of Counsel

James H. Neeld, III

James Leon Young

J. Will Young

1906-1996

Tony Carlisle

Administrator

IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI

GEORGIA PACIFIC

PLAINTIFF

VS.

NO. 251-12-2530-COV

MISSISSIPPI PRODUCTS INC

DEFENDANT(S)

TRUSTMARK NATIONAL BANK

GARNISHEE-DEFENDANT

WRIT OF GARNISHMENT

STATE OF MISSISSIPPI

TO ANY LAWFUL OFFICER OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY:

WHEREAS GEORGIA PACIFIC, recovered a final judgment in this cause which has a current balance of \$79,738.13 with interest accruing against defendant, ^{FEIN: 64-0830599} _____; and said plaintiff having made proper suggestion for writ of garnishment against garnishee-defendant, whose agent is ANY OFFICER OR BANK TELLER 248 E CAPITOL ST, JACKSON MS 39201-2502.

We, therefore, command you to summon said, garnishee, to answer within thirty (30) days of service of process, under oath in writing:

FIRST: Whether TRUSTMARK NATIONAL BANK be indebted to DEFENDANT(S) or were so indebted at the time of the service of the writ or have at any time since been so indebted; and if so indebted, at what sum, whether due or not, and when due or to become due and how the debt is evidenced and what interest it bears. Said indebtedness is to include, but not be limited to, all checking and savings accounts, certificates of deposit, and the contents of any safety deposit boxes at the time of service of process therefore.

SECOND: What effects of DEFENDANT(S) you have or had at any time of the service of the writ on you or have had since in your possession or under your control.

THIRD: Whether you know or believe any person is indebted to DEFENDANT(S) or either of them; and if so, whom, and what amount and where he resides.

FOURTH: Whether you know or believe that any other person has effects of DEFENDANT(S) or either of them in his possession or under his control and if so, who and where he resides.

FIFTH: If DEFENDANT(S) is your employee, his or her wages, salary or other compensation is totally exempt for a period of thirty (30) days from the date of service of this writ, thereafter 75% of said wages, salary or other compensation due or to become due is exempt by law from garnishment. The remaining non-exempt disposable earnings shall be retained by you for such time as is necessary to accumulate a sum equal to the amount shown on the writ as due plus interest from the date of the judgment and court costs, and UNLESS OTHERWISE AUTHORIZED BY THE COURT, you shall make only one (1) payment to Stephen E. Gardner when said amount has been accumulated, provided that at least one payment must be made per year for the amount withheld during the preceding year. If the Defendant leaves your employment, you shall notify Stephen E. Gardner within fifteen (15) days and pay into Stephen E. Gardner all sums that have been withheld.

WITNESS MY SIGNATURE this the 31 day of Aug, 2012

Circuit Clerk
THE FIRST JUDICIAL DISTRICT OF HINDS

BY: Barbara Dunn D.C.

Stephen E. Gardner
Mississippi Bar No. 4749
YoungWilliams P.A.
P. O. Box 23059
Jackson, MS 39225-3059
(601) 948-6100

BARBARA DUNN, CIRCUIT CLERK
HINDS COUNTY, FIRST DISTRICT
P. O. BOX 327
JACKSON, MS 39205

PROOF OF SERVICE - GARNISHMENT
(PROCESS SERVER)

FILED

OCT - 8 2012

Trustmark Bank / MS. Products
Name of Person or Entity served Inc.

BARBARA DUNN, CIRCUIT CLERK

I, the undersigned process server, served the Garnishment upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

() FIRST CLASS MAIL AND ACKNOWLEDGMENT SERVICE. By mailing (by first class mail, postage prepaid) copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender. (Attach completed acknowledgment of receipt pursuant to M.R.C.P. Form 1B).

(x) PERSONAL SERVICE. I personally delivered copies to Corrinia Cooper on the 4th day of September, 2012, where I found said person in Blinds County of the State of Mississippi. (Agent of Process: _____)

() CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or other evidence of actual delivery to the person served.)

() I was unable to serve the Garnishment.

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ 35.00

Process server must list below: (Please print or type)

Name: Craig Wells
Address: P.O. Box 4404
Brandon, MS 39047
Telephone: (601) 540-0051

9/4 - served
Corrinia Cooper @ 250pm

STATE OF MISSISSIPPI:

COUNTY OF Rankin:

PERSONALLY APPEARED BEFORE ME THE UNDERSIGNED AUTHORITY is and for the state and county aforesaid, the within named Craig Wells who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service" are true and correct as therein stated.

Craig Wells
Process Server (Signature)

SWORN TO AND SUBSCRIBED before me, this the 6th day of September, 2012.

Rebecca F. Watkins
NOTARY PUBLIC

MY COMMISSION EXPIRES:

10-26-14



IN THE COUNTY COURT OF THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI

GEORIGA PACIFIC

FILED

PLAINTIFF

VS.

MAR 14 2013

CAUSE NO. 251-12-2530

BARBARA DUNN, CIRCUIT CLERK

BY _____ D.C.

MISSISSIPPI PRODUCTS, INC

DEFENDANT

ORDER ALLOWING EXAMINATION OF JUDGMENT DEBTOR
MISSISSIPPI PRODUCTS, INC

CIVIL ACTION NUMBER: 251-12-2530

THIS DAY this cause came on to be heard on ex parte Motion for Examination Of Judgment Debtor filed by the Plaintiff in the above styled and numbered cause and the Court having and considered said Motion and being advised in the premises, is of the opinion that said Motion is well taken and should be and hereby is sustained.

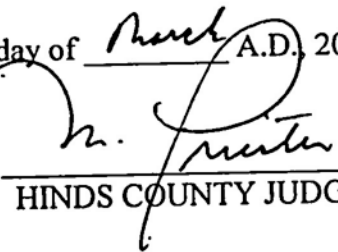
IT IS, THEREFORE, ORDERED AND ADJUDGED that GEORIGA PACIFIC, by and through its attorney of record, in the above styled and numbered cause, be allowed to examine any and all books, papers, documents and all other notes of any kind which indicate the following:

- (1) Any and all real property owned by the Debtor in the State of Mississippi
- (2) Any and all motor vehicles now owned by the debtor or in his custody and control
- (3) Any and all reports of income, including Federal and State Tax Returns
- (4) Any and all documents pertaining to partnership interest, assets, agreements, operating agreements, oil, gas and mineral leases, interest and ownership


- (5) Any and all bank statements, checking accounts information and savings accounts information

IT IS FURTHER ORDERED AND ADJUDGED that a Subpoena be issued by the clerk of this Court and be served upon the above Judgment debtor directing that said Judgment Debtor, MISSISSIPPI PRODUCTS, INC, to be served on JONATHAN LEE at 2457 VALLEY ST, JACKSON, MS 39209 to appear at the Hinds County Courthouse in Jackson, MS on the 4th day of April, 2013 at 9:30 o'clock a.m. And that upon his appearance that Plaintiff be permitted to examine him under oath Pursuant to MRCP 69(b) and Miss Code Ann §13-1-261-et-seg.

SO ORDERED AND ADJUDGED on the 14th day of March A.D. 2013.


HINDS COUNTY JUDGE

Submitted:


STEPHEN E. GARDNER
MSB #4749
YOUNGWELLS, PA
P.O. BOX 23059
JACKSON, MISSISSIPPI 39225-3059
Telephone: 601 948 6100