



BALLBALL

JACK OWEN
WRITER'S EMAIL: CCOWEN@BALL-BALL.COM
WRITER'S DIRECT DIAL: (334) 387-2886

September 15, 2020

VIA ELECTRONIC FILING AND FEDERAL EXPRESS

Mr. Scott S. Harris
Clerk of Court
Supreme Court of the United States
1 First Street, N.E.
Washington, DC 20543

Re: *Aladdin Manufacturing Corp., et al. v. The Water Works & Sewer Bd. of the Town of Centre, et al.*, No. 20-231 (U.S.)

Dear Mr. Harris:

I represent the Defendant named in the two cases pending in the Alabama trial courts as "MFG Chemical, Inc." ("MFG"). MFG was a petitioner before the Alabama Supreme Court in *Ex parte Aladdin Manufacturing Corp. et al.*, No. 1170864 (Ala. Dec. 20, 2019), a proceeding that is directly related to the Petition for Writ of Certiorari (the "Petition") in the above-referenced matter.

This letter serves to notify this Court that MFG maintains its interest in this Petition and supports granting the Petition for those reasons stated therein, including but not limited to the fact there is no personal jurisdiction over MFG in the Alabama trial courts. Should this Court grant the Petition, MFG intends to seek all available relief. *See* Supreme Court Rule 12.6 ("All parties to the proceeding in the court whose judgment is sought to be reviewed are deemed parties entitled to file documents in this Court"); *Black v. United States*, 561 U.S. 465, 468 n.1 (2010) (noting that under Rule 12.6, a respondent in support of petitioners qualifies for relief).

BALL, BALL, MATTHEWS & NOVAK, P. A.
ATTORNEYS AT LAW
P. O. BOX 2148, MONTGOMERY, AL 36102-2148
445 DEXTER AVENUE, SUITE 9045, MONTGOMERY, AL 36104

Please let me know if you have any questions regarding this matter or need anything further at this time from MFG.

Respectfully submitted,

/s/ Clyde C. Owen, Jr.

Clyde C. (Jack) Owen, Jr.
Counsel of Record for
Respondent, MFG Chemical, Inc.

cc: See attached service list

Counsel for The Water Works and Sewer Board of the Town of Centre and The Water Works and Sewer Board of the City of Gadsden.

Jere L. Beasley
Rhon E. Jones
Richard D. Stratton
J. Ryan Kral
David Diab
Michael L. Dunphy
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
P.O. Box 4160
Montgomery, AL 36103
(334) 269-2343
jere.beasley@beasleyallen.com
rhon.bones@beasleyallen.com
rick.btratton@beasleyallen.com
ryan.kral@beasleyallen.com
david.diab@beasleyallen.com
michael.dunphy@beasleyallen.com

Roger H. Bedford
ROGER BEDFORD & ASSOCIATES, P.C.
P.O. Box 370
Russellville, AL 35653
(256) 332-6966
senbedford@aol.com

Thomas O. Sinclair
SINCLAIR LAW FIRM, LLC
2000 South Bridge Parkway, Suite 601
Birmingham, AL 35209
[\(205\) 868-0818](tel:2058680818)
tsinclair@sinclairlawfirm.com

Counsel for Aladdin Manufacturing Corp.:

Thomas H. Dupree Jr.
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
(202) 955-8500
TDupree@gibsondunn.com

Counsel for ArrowStar, LLC:

Emily H. Mills
Donald D. Knowlton
CUSIMANO, ROBERT & MILLS, LLC
153 South 9th Street
Gadsden, AL 35901
(256) 543-0400
emily@alalawyers.net
don@alalayers.net

Warren N. Coppedge, Jr.
COPPEDGE & ASSOCIATES, P.C.
508 South Thornton Avenue
Dalton, GA 30720
(706) 226-0040
trisha@coppedgefirm.com

Counsel for The Dixie Group, Inc.:

John M. Bergquist
Deborah A. Wakefield
PARSONS, LEE & JULIANO, P.C.
600 Vestavia Parkway, Suite 300
Birmingham, AL 35216
(205) 326-6600
jbergquist@pljpc.com
dwakefield@pljpc.com

W. Scott Parrish
M. Ellis Lord
MILLER & MARTIN PLLC
1200 Volunteer Building
832 Georgia Avenue
Chattanooga, TN 37 402
(423) 756-6600
scott.parrish@millermartin.com
ellis.lord@millermartin.com

Counsel for ECMH d/b/a Clayton Miller Hospitality Carpets and Emerald Carpets, Inc.:

E. Allen Dodd, Jr.
James Eric Brisendine
SCRUGGS, DODD & BRISENDINE
207 Alabama Avenue, SW
Fort Payne, AL 36968
(256) 845-5932
eadscruggs@farmerstel.com
jebscruggs@farmerstel.com

David J. Marmins
Morgan E.M. Morrison
ARNALL GOLDEN GREGORY LLP
17117th Street, NW
Suite 2100
Atlanta, GA 30363
(404) 873-8500
david.marmins@agg.com
morgan.morrison@agg.com

Counsel Engineered Floors, LLC and J&J Industries, Inc.:

Brannon J. Buck
Brett Andrew Ialacci
Christopher B. Driver
BADHAM AND BUCK LLC
2001 Park Place North, Suite 500
Birmingham, AL 35203
(205) 521-0036
bbuck@badhambuck.com
bialacci@badhambuck.com
cdriver@badhambuck.com

W. Randall Wilson
Michael J. Dumitru
MILLER & MARTIN PLLC
1200 Volunteer Building
832 Georgia Avenue
Chattanooga, TN 37402
(423) 756-6600
randy.wilson@millermartin.com
michael.dumitru@millermartin.com

Counsel for Kraus USA, Inc.:

Annette L. Kinderman
Crawford S. McGivaren, Jr.
CABANISS, JOHNSTON GARDNER
DUMAS & O'NEAL LLP
2001 Park Place North, Suite 700
Birmingham, AL 35283
(205) 716-5200
alk@cabaniss.com
csm@cabaniss.com

Nicholas B. Gorga
Jeremy D. Lockhart
HONIGAN LLP
660 Woodward Avenue
2290 First National Building
Detroit, MI 48226
(313) 465-7000
ngorga@honigan.com
jlockhart@honigan.com

Counsel for Lexmark Carpet Mills, Inc.:

John W. Scott
Joshua S. Thompson
Ethan A. Wilkinson
SCOTT, DUKES & GEISLER, P.C.
211 22nd Street North
Birmingham, AL 35203
(205) 251-2300
jscott@scottdukeslaw.com
jthompson@scottdukeslaw.com
ewilkinson@scottdukeslaw.com

Michael J. Sullivan
Vonna L. Benjamin
WOMBLE BOND DICKINSON (US) LLP
271 17th Street, NW
Suite 2400
Atlanta, GA 30363
(404) 879-2479
michael.sullivan@wbd-us.com
vonna.l.benjamin@wbd-us.com

Counsel for Indian Summer Carpet Mills, Inc.:

Gregory A. Brockwell
BROCKWELL SMITH LLC
420 20th Street North, Suite 2000
Birmingham, AL 35203
(205) 800-8505
greg@brockwellsmith.com

John W. Dodson
Michelle L. Crunk
DODSON GREGORY, LLP
2700 Highway 280, Suite 410 E
Birmingham, AL 35223
(205) 834-9170
jwd@dodsongregory.com
mlc@dodsongregory.com

Counsel for MFG Chemical, Inc.:

Richard E. Broughton
Clyde C. ("Jack") Owen, Jr.
Miland F. Simpler, III
BALL, BALL, MATTHEWS & NOVAK P.A.
445 Dexter Avenue, Suite 9045
Montgomery, AL 36104
(334) 387-7680
rbroughton@ball-ball.com

Counsel for Milliken & Company.

Sharon D. Stuart
CHRISTIAN & SMALL LLP
505 North 20th Street, Suite 1800
Birmingham, AL 35203
(205) 795-6588
sdstuart@csattorneys.com

Meaghan G. Boyd
ALSTON & BIRD, LLP
1201 West Peachtree Street
Atlanta, GA 30309
(404) 881-7000
meaghan.boyd@alston.com

Counsel for Kaleen Rugs, Inc. and Oriental Weavers USA, Inc.:

John G. Dana
Bruce L. Gordon
GORDON, DANA & GILMORE, LLC
600 University Park Place, Suite 100
Birmingham, AL 35209
(205) 87 4-7950
jdana@gattorney.com
bgordon@gattorney.com

David Higney
Matthew D. Brownfield
GRANT, KONVA LINKA & HARRISON, PC
633 Chestnut Street, 9th Floor
Chattanooga, TN 37450
(423) 756-8400
dhighney@gkhpc.com
mbrownfield@gkhpc.com

Counsel for Textile Rubber and Chemical Company, Inc.:

Peter M. Crofton
SMITH, GAMBRELL & RUSSELL, LLP
1230 Peachtree Street, NE
Promenade, Suite 3100
Atlanta, GA 30309
(404) 815-3500
pcrofton@sgrlaw.com

Bryan A Grayson
LLOYD, GRAY, WHITEHEAD &
MONROE, P.C.
880 Montclair Road, Suite 100
Birmingham, AL 35213
(205) 967-8822
bgrayson@lgwmlaw.com