

2520032903168

**PLAN ADMINISTRATOR'S STATEMENT
FOR ALTERNATIVE METHOD OF COMPLIANCE
UNDER REGULATION §2520.104-23**

1. **NAME AND ADDRESS OF EMPLOYER.** The name and address of the employer is:

Southern Pipe & Supply Company, Inc.
Post Office Drawer 5738
Meridian, Mississippi 39302

2. **EMPLOYER IDENTIFICATION NUMBER.** The employer identification number assigned to the employer by the Internal Revenue Service is 64-0291778.

3. **DECLARATION.** The employer maintains a plan or plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

4. **NUMBER OF PLANS AND EMPLOYEES.** The employer maintains one (1) such plan which covers one (1) employee. The plan consists of a deferred compensation agreement between the employer and one employee.

Dated: Dec. 17th, 1992

SOUTHERN PIPE & SUPPLY COMPANY, INC.

By: Mark Daulton

Name: _____

Title: President



BERKOWITZ, LEFKOVITS, ISOM & KUSHNER

A PROFESSIONAL CORPORATION

1600 SOUTHTRUST TOWER
BIRMINGHAM, ALABAMA 35203
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WRITER'S DIRECT DIAL NUMBER:

December 21, 1992

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A. BERKOWITZ
(1907-1985)

* ADMITTED IN THE DISTRICT
OF COLUMBIA, MASSACHUSETTS
& LOUISIANA ONLY

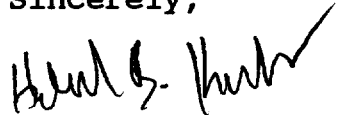
Pension and Welfare Benefits Administration
U. S. Department of Labor
Post Office Box 75212
Washington, D.C. 20013-5212

Gentlemen:

In accordance with the Department's notice published in the Federal Register (S7FR33019), enclosed please find:

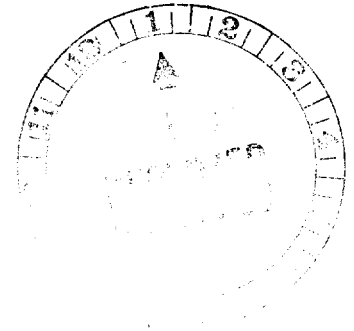
- (1) the statement required by Labor Regulation 2520.104-23 with respect to the "top hat plan(s)" maintained by our client Southern Pipe & Supply Company, Inc.; and
- (2) a check in the amount of \$1,000 representing the civil penalty required by the Department's notice.

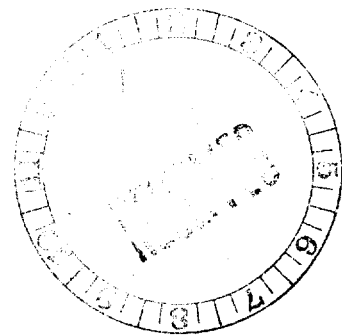
Sincerely,


Harold B. Kushner

HBK/cw
Enclosures
cc: Martin D. Davidson (w/encl.)

19,045





19045

DS

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BIRMINGHAM, ALABAMA 35203



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