

LAW OFFICE OF
BOSWELL & KOBER
A PROFESSIONAL CORPORATION

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December 20, 1995

CERTIFIED MAIL NO. Z 173 049 883
RETURN RECEIPT REQUESTED

2520032031507

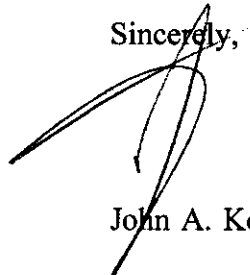
Excess Benefit Plan and Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Paul C. Higginbotham & Company
EIN: 75-1732559
Paul C. Higginbotham & Company\Employees' Deferred Compensation Plan

Dear Sir or Madam:

Reference the above plan, on behalf of Paul C. Higginbotham & Company, enclosed please find an original statement in accordance with 29 C.F.R. Section 2520.104-23 requesting a reporting exemption.

Sincerely,



John A. Kober

JAK:mlb
Enclosure

cc: James R. Reid
Robert D. Roten

MLB\DAL\Higginbotham\DOLFiling.DCP

PAUL C. HIGGINBOTHAM & COMPANY
260 Bailey Avenue
Fort Worth, Texas 76106

November 30, 1995

Excess Benefit Plan and Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

CERTIFIED LETTER/RRR

Re: Paul C. Higginbotham & Company\Employees' Deferred Compensation Plan

Dear Sir or Madam:

Paul C. Higginbotham & Company (the "Employer"), a Texas corporation, having been assigned employer identification number 75-1732559 by the Internal Revenue Service, files this statement in accordance with 29 C.F.R. Section 2520.104-23. The employer's address is 260 Bailey Avenue, Fort Worth, Texas 76101.

The Employer maintains the Paul C. Higginbotham & Company Employees' Deferred Compensation Plan ("Plan") to provide benefits through the Paul C. Higginbotham & Company Nonqualified Deferred Compensation Trust ("Trust") to employees who are limited by the Internal Revenue Code in maximizing their benefits in the Paul C. Higginbotham & Company Savings and Investment Plan and Trust.

The number of participants in the plan are approximately ten. Plan benefits are paid from general assets of the employer. Bank of Commerce, Fort Worth, Texas, a state banking association, is the Trustee of the rabbi trust (which is a trust holding the assets). Paul C.

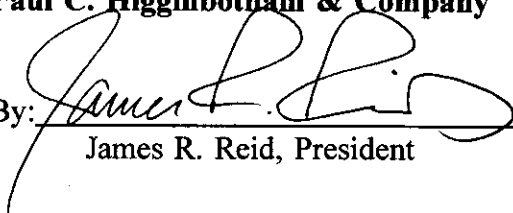
Excess Benefit Plan
and Exemption
Page 2
November 13, 1995

Higginbotham, the employer, will provide copies of the Plan documents and Trust agreement upon request.

Sincerely,

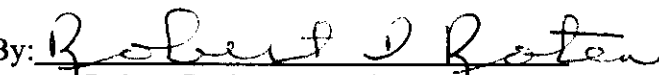
EMPLOYER:

Paul C. Higginbotham & Company

By: 
James R. Reid, President

TRUSTEE:

Bank of Commerce

By: 
Robert D. Roten, Senior
Vice President and
Trust Officer

cc: Robert D. Roten
John A. Kober

MLB\DAL\Higginbotham\Rabbi\PWBA001.907