

Plaintiff,

BALDWIN COUNTY, ALABAMA

VS.

ROBERT HINOTE, Individually,  
and d/b/a HINOTE SAND AND  
GRAVEL,

Defendant.

## BILL OF COMPLAINT

Plaintiff claims of the Defendant FORTY-EIGHT THOUSAND TWO HUNDRED EIGHTY and no/100 DOLLARS (\$48,280.00), the rent of one (1) gravel and sand washing and screening plant and tract of land located in Baldwin County, Alabama, as follow; to-wit:

The Washington Wilkins Tract in Section 38, Township 3 South, Range 2 East and Valentine DuBrocka Tract in Section 37, Township 3 South, Range 2 East and Lot or East Sub-division of Lot A of Fractional Section 5, Township 3 South, Range 2 East.

demised by the Plaintiff to the Defendant on the 27th day of June, 1967, and ending on the 31st day of January, 1971.

Attorney for Plaintiff

Defendant Resides in:  
 Robertsdale, Alabama

**FILED**

SEP 18 1967

**ALICE J. DUCK**

CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. ....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Robert Hinote, Individually, and  
d/b/a Hinote Sand and Gravel

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed  
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Robert Hinote, individually, and d/b/a Hinote Sand & Gravel, Defendant.....

by Ray Moore Materials, Inc., a corporation,

....., Plaintiff.....

Witness my hand this.....

day of.....

19.....

Clive J. Duck, Clerk

E4: 9-27-67

No. 7743

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

RAY MOORE MATERIALS, INC.,

a corporation

Plaintiffs

vs.  
Robert Hinote, Individually, &  
d/b/a Hinote Sand and Gravel

Defendants

SUMMONS AND COMPLAINT

Filed ..... **FILED** ..... 19.....

SEP 18 1967

Clerk

**ALICE J. DUCK**

CLERK  
REGISTER

Richard C. Lacey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

**RECEIVED**

Received In Office

SEP 18 1967

19.....

**TAYLOR WILKINS**

~~SHERIFF~~

Sheriff

I have executed this summons

this Sept 27 1967

by leaving a copy with

Robert Hinote

50 miles or

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY H. J. Hall  
DEPUTY SHERIFF

Sheriff

H. J. Hall Deputy Sheriff

R. Duck

P. O. DRAWER A-J

**RICHARD C. LACEY**

TELEPHONE 928-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

September 15, 1967

Mrs. Alice J. Duck  
Circuit Clerk  
Baldwin County Courthouse  
Bay Minette, Alabama

7743

Re: Ray Moore Materials, Inc.,  
a corporation,  
Vs.  
Robert Hinote, Individually,  
& d/b/a Hinote Sand & Gravel

Dear Mrs. Duck:

Please file subject case for service on Mr. Robert  
Hinote.

Thank you.

Sincerely,

  
Richard C. Lacey

RCL:mt

Encls.