

ORIGINAL

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,  
NO. 8512

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon TIDEWATER HOMES CORP., a corporation,  
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 TIDEWATER HOMES CORP., a corporation, defendant,  
by THE SAM A. WING CO., INC., a corporation,  
Plaintiff.

WITNESS my hand this 15 day of Jan, 1969.

Alice J. Duck  
ALICE J. DUCK, Clerk.

THE SAM A. WING CO., INC., a Corporation,

Plaintiff,

VS.

TIDEWATER HOMES CORP., a Corporation,

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

8512

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant ONE THOUSAND SIX HUNDRED EIGHTY-EIGHT AND 52/100 (\$1,688.52)----- DOLLARS due from it by account, on, to-wit, the 23rd day of September, 1968, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement filed herewith.

Count II.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SIX HUNDRED EIGHTY-EIGHT AND 52/100 (\$1,688.52)----- DOLLARS due from it by account stated between the Plaintiff and the Defendant on, to-wit, the 23rd day of September, 1968, which sum of money with the interest thereon is still unpaid.

Continued, Summons & Complaint:

The Sam A. Wing Co. vs. Tidewater Homes

Count III.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SIX HUNDRED EIGHTY-EIGHT AND 52/100 (\$1,688.52) ----- DOLLARS due from it for merchandise, goods and chattels sold by the Plaintiff to the Defendant between the 4th day of June, 1968, and the 23rd day of September, 1968, which sum of money with the interest thereon is still unpaid.

  
E. G. RICKABY, Attorney for  
Plaintiff.

Defendant's address is:

P. O. Box 118, Stapleton, Alabama  
Attention: J. T. Richman

**FILED**

JAN 15 1969

**ALICE J. DUCK**

CLERK  
REGISTER

COUNTY OF Dallas

8G-188 (13743)

STATE OF Texas

Be it remembered, that on this 30th day of December 1968  
A. D., 1968, personally appeared before me, the undersigned authority, J. E. Davenport  
known to me  
who being duly sworn, upon his oath stated that he is Vice President  
of The Sam A Wing Co. Inc.,  
{ a corporation organized and doing business under the laws of the State of Texas  
{ and has been duly authorized by said corporation to make this affidavit  
{ a partnership composed of  
a sole trader doing business as  
and that as such he makes this affidavit; that he is familiar with the books and business of  
said The Sam A Wing Co. Inc.; that the attached account against  
Tidewater Homes Corp., of Stapleton, Ala., Box 118  
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-  
posing the said account were sold and delivered to said Tidewater Homes Corp.  
at { ~~its~~ } special instance and request, that credit has been duly given for all payments and  
{ ~~his~~ }  
just and lawful offsets to which said account is entitled as thereon stated, and that the balance  
thereof, amounting to the sum of SIXTEEN HUNDRED EIGHTY EIGHT and 52/100 Dollars  
(\$1,688.52...) with interest from date 19 is justly due and  
remains unpaid.

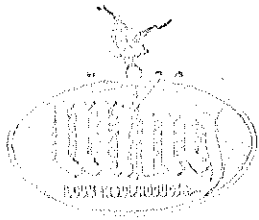
I hereby certify under my official seal that I am authorized as a Notary Public to  
administer oaths under the laws of the State of Texas  
and that the foregoing was subscribed and sworn to before me on the day and year  
first above stated.

Emm N. Schuler  
Notary Public

County of Dallas State of Texas  
My commission expires June 30, A. D. 1969

ACCOUNTS RECEIVABLE

No. 41750



*The* SAM A. WINE COMPANY *Inc.*

P. O. BOX 1170 • 2929 WEST KINGSLEY ROAD • DR 8-6181  
GARLAND, TEXAS 75041  
D-U-N-S 733-2794

INVOICE NO.

INVOICE DATE

041750

07 11 68

SOLD  
TO  
(IF OTHER  
THAN  
SHIP TO)

TIDEWATER HOMES CORP  
P.O. BOX 118  
STAPLETON, ALA

SHIP  
TO

TIDEWATER HOMES CORP  
HWY 58 SOUTH  
STAPLETON, ALA

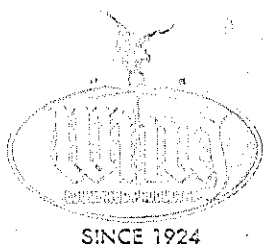
UST. ACCT. NO.	AREA WHSE.	COLLECT	FPD.	SHIPPED VIA	DATE SHIPPED	COD	SALES NO.	SALESMAN'S NAME
050005	05 WTX		X	ETWF FROM GARLAND	07 11 68		12005	00000000
CUST. ORD. NO. OR ORD. BY	SHIP. ORD. NO.	TERMS						
3031	A39198	REGULAR						
PRODUCTION CODE	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	TOTAL			
4060 1551	75	PR 1-3 X 4-3 OUTSIDE BLINDS	4.61	345.75				
4060 1571	6	PR 1-3 X 5-11	6.05	36.30	382.05			
NET PRICES					382.05			

ALL BILLS DUE AND PAYABLE IN GARLAND, DALLAS COUNTY TEXAS.

PLEASE PAY FROM THIS INVOICE  
STATEMENT SENT ONLY UPON REQUEST

ACCOUNTS RECEIVABLE

No. 44833



# The SAM A. WINE COMPANY Inc.

P. O. BOX 1170 • 2929 WEST KINGSLEY ROAD • BR 8-6181

GARLAND, TEXAS 75041

D-U-N-S 753-2794

INVOICE NO.

INVOICE DATE

046003

00 12 68

SOLD  
TO  
(IF OTHER  
THAN  
SHIP TO)

TIDEWATER HOMES CORP  
P.O. BOX 7451  
MOBILE, ALA

SHIP  
TO

TIDEWATER HOMES CORP  
HWY 90 SOUTH  
STAPLETON, ALA

CUST. ACCT. NO.	AREA WHSE.	COLLECT	PPD.	SHIPPED VIA	DATE SHIPPED	COD ✓
052023	05 13X		X	STRICKLAND FROM GARLAND	07 12 68	
CUST. ORD. NO. OR ORD. BY	SHIP. ORD. NO.	TERMS	SALES NO.	SALESMAN'S NAME	AUG 12 1968	
3190	AA1537	REGULAR	10005	00000500		

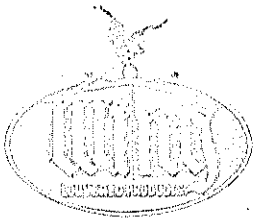
PRODUCTION CODE	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	TOTAL
4060 1551	102FR	1-3 X 4-3 OUTSIDE BLINDS	4.61	470.22	470.22
NET PRICES					470.22
PLEASE NOTE WE INCREASED QUANTITY TO COMPLY WITH STANDARD CARTONING (PAIR TO CARTON) AS STATED IN OUR NET PRICE SHEET.					

ALL BILLS DUE AND PAYABLE IN GARLAND, DALLAS COUNTY TEXAS.

PLEASE PAY FROM THIS INVOICE

# ACCOUNTS RECEIVABLE

No. 39965



*The* SAM A. WINE COMPANY Inc.

P. O. BOX 1170 • 2929 WEST KINGSLEY ROAD • BR 8-6181  
GARLAND, TEXAS 75041  
D-U-N-S 733-2794

INVOICE NO.

INVOICE DATE

SINCE 1924

039965

06 04 68

SOLD  
TO  
(IF OTHER  
THAN  
SHIP TO)

TIDE WATER HOMES  
P.O. BOX 118  
STAPLETON, ALA

SHIP  
TO

TIDE WATER HOMES  
HWY 59 SOUTH  
STAPLETON, ALA

CUST. ACCT. NO.	AREA WHSE.	COLLECT	FPD.	SHIPPED VIA	DATE SHIPPED	COD V
05/030	05 11V		X	TRANSCONTINENTAL FROM GARLAND	06 04 68	
CUST. ORD. NO. OR ORD. BY	SHIP. ORD. NO.	TERMS	SALES NO.	SALESMAN'S NAME		
2507	A28660		12075	00000000		

PRODUCTION CODE	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	TOTAL
4060 1571	18	PR 1-3 X 5-11 OUTSIDE BLINDS	6.05	108.90	
4060 1551	75	PR 1-3 X 4-3	4.61	345.75	454.65
NET PRICES					454.65

ACCOUNTS RECEIVABLE

No. 45780



SINCE 1924

The SAM A. WINE COMPANY Inc.

P. O. BOX 1170 • 2929 WEST KINGSLEY ROAD • BR 8-6181

GARLAND, TEXAS 75041

D-U-N-S 733-2794

INVOICE NO.

INVOICE DATE.

045780

09 18 68

SOLD  
TO  
(IF OTHER  
THAN  
SHIP TO)SHIP  
TOTIDEWATER HOMES CORP  
P.O. BOX 118  
STAPLETON, ALA

CUST. ACCT. NO.	AREA WHSE.	COLLECT	PPD.	SHIPPED VIA	DATE SHIPPED	COD ✓
050033	05 2NC	X		BOWMAN FROM CHARLOTTE, A42356	09 18 68	
CUST. ORD. NO. OR ORD. BY	SHIP. ORD. NO.	TERMS	SALES NO.	SALESMAN'S NAME	SEP 23 1968	
83268		REGULAR	12005	00000SC0		

PRODUCTION CODE	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT	TOTAL
4060 1551	60	PR 1-3 X 4-3 OUTSIDE BLINDS	4.74	284.40	
4060 1571	15	PR 1-3 X 5-11	6.48	97.20	381.60
NET PRICES					381.60

PLEASE PAY FROM THIS INVOICE

8512

The Sam A. Wing  
Co. Inc. a corp.  
Plt.

vs.

Lidewater Homes  
Corp. a corp.

ORIGINAL

FILED

JAN 15 1969

ALICE J. DUCK  
CLERK  
REGISTER

E. L. Rickaby

Received 15 day of Jan 1969  
and on 16 day of Jan 1969  
served a copy of the within Pk  
on Lidewater Homes

by service on J. A. Heckman,  
mgr.

TAYLOR WILKINS, Sheriff

By W. A. Salter,  
Deputy

Sheriff claims 24 miles at

Ten Cents per mile Total \$ 2.40

TAYLOR WILKINS, Sheriff

BY W. A. Salter,  
DEPUTY SHERIFF



SAM A. WING, COMPANY, INC.,	)	IN THE CIRCUIT COURT
Plaintiff	)	OF BALDWIN COUNTY, ALABAMA
Vs.	)	CASE NO. 8512
TIDEWATER HOMES CORPORATION	)	
Defendant	)	

MOTION TO STAY

Comes now the Defendant, TIDEWATER HOMES CORPORATION, and moves this Honorable Court to stay this cause and for grounds of said motion shows as follows:

For that heretofore and on, to-wit, the 24th day of October, 1969, the Defendant, TIDEWATER HOMES CORPORATION, filed in the United States District Court for the Southern District of Alabama, Southern division a Petition praying that it be adjudicated a Bankrupt and has in fact been so adjudicated.

Wherefore, the premises considered, the Defendant respectfully prays that this Court will stay this cause pending the outcome of the Bankruptcy proceedings described hereinabove.

CAFFEY, GALLALEE & EDINGTON

BY *F. J. J. J. J.*  
Attorneys for Defendant

**FILED**

DEC 2 1970

ALICE J. DUCK CLERK  
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 30<sup>th</sup> day of Nov, 19 70, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

*F. J. J. J. J.*

ROBERT P. DENNISTON

ATTORNEY AT LAW

SUITE 1706 MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

TELEPHONE:  
205-432-8708

MAILING ADDRESS:  
POST OFFICE BOX 586

November 16, 1970

Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama 36507

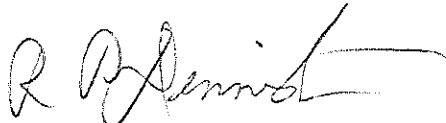
Dear Mrs. Duck:

RE: The Sam A. Wing Co., Inc. v. Tide Water Homes  
Corporation, Case No. 8512

We have received a copy of the notice of the setting for trial of the above described case on Tuesday, December 1, 1970. If we have not already done so, we herewith withdraw the appearance of Hamilton, Denniston, Butler & Riddick, and of Robert P. Denniston, as attorneys for Tide Water Homes Corporation. The client has already been notified of this.

The defendant has been in bankruptcy for more than one year. We are sending a copy of this letter to attorneys for the plaintiff, and also to Ronald P. Slepian, attorney for the bankrupt.

Yours very truly,



R. P. DENNISTON

RPD:ss  
File #2

cc: James W. Tarlton, III, Esquire  
Hamilton, Butler, Riddick & Latour  
P. O. Box 1743  
Mobile, Alabama 36601

Ronald P. Slepian, Esquire  
McDermott & Slepian  
P. O. Box 2025  
Mobile, Alabama 36601

E. G. Rickarby, Esquire  
Fairhope, Alabama 36532

FILED

NOV 17 1970

ALICE J. DUCK CLERK  
REGISTER

Our File No. 68-387

Your File No. \_\_\_\_\_

Law Offices  
E. G. RICKARBY  
35 SOUTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

CODE 205  
Telephone: 923-9836

Mailing Address  
P. O. BOX 471

January 13, 1969

Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

8512

Dear Mrs. Duck:

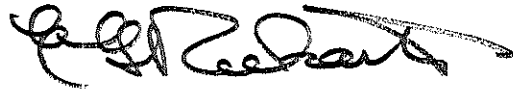
Inre: The Sam A. Wing Co., Inc. vs. Tidewater Homes Corp.

Enclosed find Summons & Complaint in the above styled cause,  
together with itemized and verified statement of account  
and check for \$35.00 Court costs.

Please process, hand copy of same to Sheriff and oblige.

Thanks!

Yours very truly,



jlb  
Encls.  
1-22-69

THE SAM A. WING CO., INC., a Corporation,  
Plaintiff,  
VS.  
TIDE-WATER HOMES CORP., a Corporation,  
Defendant.

: IN THE CIRCUIT COURT OF  
: BALDWIN COUNTY, ALABAMA  
:  
: AT LAW CASE NO. 8512  
:  
:

PLEAS

Comes the Defendant in the above styled cause and for answer to the Complaint heretofore filed in said cause and to each count thereof, separately and severally, files the following separate and several Pleas:

1. The allegations are untrue.
2. Defendant is not guilty.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By *R. D. Hamilton*

ATTORNEYS FOR DEFENDANT

*P.O. Box 1743  
Mondak, Alabama 36601*

Defendant demands a trial by jury in the above styled cause and of all issues thereunder.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By *R. D. Hamilton*

ATTORNEYS FOR DEFENDANT

**FILED**

FEB 17 1969

**ALICE J. DUCK** CLERK  
REGISTER