

BYRD L. MOORE and  
WILLIAM WEST, a  
partnership, d/b/a  
MOORE SUPPLY COMPANY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY:

Complainants

-VS-

GEORGIA RAMSEY, Ind. and  
d/b/a PARADISE BEACH CASINO

Respondent

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Byrd L. Moore, and William West, a partnership, and doing  
business as Moore Supply Company, presents this Bill of Complaint  
against Georgia Ramsey, Ind. and doing business as Paradise Beach  
Casino and thereupon Complainants show unto the Court and your  
Honor as follows:

I

That your Complainant is a partnership composed of Byrd L.  
Moore and William West, as general partners and that both are over  
the age of twenty-one years, and are residents of Baldwin County,  
Alabama. That the Respondent, Georgia Ramsey, is over the age of  
twenty-one years and is a resident of Baldwin County, Alabama.

II

That on to wit: the 9th day of June, 1958, the Respondent,  
Georgia Ramsey, contracted with the complainants, to furnish cer-  
tain materials to be used in a building which was then and there  
being erected on the following described real property owned by  
the said Georgia Ramsey, situated in Baldwin County, Alabama, to  
wit,:

Southwest corner of Section Five (5)  
Township Five (5), South, Range Two (2) East,  
run South Eighty (80) Links to the Northeast  
corner of Lot Three (3) of the Louis Dolive  
Estate Division; thence run West along the  
North Line of Said Lot Three(3), 149.31 Chains  
to the Northeast corner of the property formerly  
owned by Mary Ella Crisostusno for a point of  
beginning; thence run East Thirty-eight and  
nine tenths (38.9) feet; thence run South One  
Hundred sixteen (116) feet; thence run North  
eighty-nine (89) degrees forty (40) minutes  
East Four Hundred (400) feet; thence run South  
00 degrees 20 feet East 130 feet to a point in  
the South fence line of the Quinney property;  
thence run South 89 degrees 40 feet West 438  
feet; thence run north 249.5 feet to the point  
of beginning, containing one and two-fifths

FILED  
OCT 29 1958  
ALICE J. DUNK, CLERK  
REGISTER

(1 2/5) acres in Dolive Grant Section 7,  
Township 5 South, Range 2 East, Baldwin  
County, Alabama.

The above described tract of land is not in a City, Town or Village and in addition to the area on which the building is situated on the said property is located contains more than one acre.

That pursuant to the contract your Complainant furnished the said materials used on the said property under their said contract by the respondent Georgia Ramsey from on to wit; the 9th day of June, 1958 until on to wit; the 26th day of August, 1958 for a total of THREE THOUSAND FOUR HUNDRED THIRTY TWO and 47/100 (\$3,432.47) DOLLARS.

An itemized statement of the materials furnished by the Complainants to the said Respondent Georgia Ramsey under their said Contract as set above is hereto attached and marked Exhibit "A" and by reference made a part hereof as though fully incorporated herein.

That the said Respondent Georgia Ramsey, paid to the Complainants including one credit memo in the amount of SIXTY NINE and 16/100 (\$69.16) DOLLARS, a total of ONE THOUSAND EIGHT HUNDRED SIXTY EIGHT and 82/100 (\$1,868.82) DOLLARS, and that there is now a balance due of ONE THOUSAND FIVE HUNDRED SIXTY THREE and 65/100 (\$1,563.65) DOLLARS, from on to wit, the 26th day of August, 1958, which sum of money together with the interest thereon is still unpaid.

### III

That on to wit: the 16th day of September, 1958, your Complainants filed in the office of the Judge of Probate, of Baldwin County, Alabama, the County where the above described land is situated the claim of lien required by Title 33, Section 41, of the 1940 Code of Alabama. A copy of which claim of lien is hereto attached and marked Exhibit "B" and by reference made a part hereof as though fully incorporated herein.

### PRAYER FOR PROCESS AND RELIEF

WHEREFORE the premises considered, your Complainants prays that your Honor will by proper process make the said Georgia Ramsey, party Respondent to this Bill of Complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing of this cause that your Honor will find the following separate and several relief.

I

That the indebtedness due to your Complainants by the Respondent for the materials furnished by the Complainants as set out in the above Bill of Complaint be ascertained and fixed.

II.


That a lien on the improvements and the land on which the said improvements are situated on the above described property be fixed and established in the form and manner prescribed by law and in the event the amount due to the Complainants is not paid within some reasonable time to be fixed by this Court that the improvements on the said property be ordered sold to satisfy the said lien.

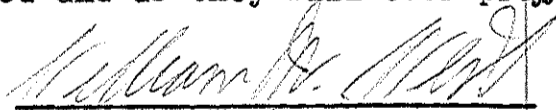
III

That a lien on the improvements on the above described property be fixed and established in the form and manner prescribed by law and in the event the amount due to the complainants is not paid within some reasonable time to be fixed by this court, that the improvements on the said property be ordered sold to satisfy the said lien.


IV

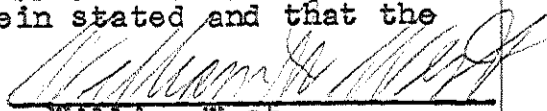
Your Complainants pray for such other further and general relief as they may be in equity entitled and as they will ever pray.

  
Solicitor for Complainant


  
William West

STATE OF ALABAMA  
COUNTY OF BALDWIN

Before me, , a Notary Public, in and for said County in said State, personally appeared William West, who is known to me and who being first duly sworn, deposes and says: That he is a general partner of Moore Supply Company and that he has personal knowledge of the facts herein stated and that the same are true and correct.

  
William West

Sworn to and subscribed before me on this the 28<sup>th</sup> day of October, 1958.

  
Notary Public

## EXHIBIT "A"

Date	Item	Cost	Tax	Total
June 9 1958	1 rule	\$ .55		
	3 balls twine	1.35		
	1 starter cord	.32		
	6' Nylon rope	.42		
	1x6 #2S4S 36'	3.53		
	1x6 #2S4S 84'	8.82		
	1 Axe	5.50	.62	\$21.11
June 11	1x4 24L 8'	1.36		
	50# 20d Galv.	8.50		
	50# 30d Galv.	8.50	.55	18.91
June 12	1 Pr. work gloves	1.39	.04	1.43
June 13	2x4 #2	9.94		
	1x4 #2	14.99		
	1x6 #2 50 lin	2.62		
	5 V crimp 238'	27.96		
	6# lead head nails	1.75		
	1 6' rule	.80		
	1 ball twine	.45		
	8 screen hooks	.28		
	1 hasp	.29		
	1 padlock	.50	1.79	61.36
June 13	1x4 # 2 flg. 38'	4.18		
	5# 8 d glv. casing	1.05	.10	5.39
June 19	1 pr. hinges	.50		
	1 chalk box	1.25	.05	1.80
June 20	2x6 #2 400'	44.00		
	5 V. Crimp 9' (ret)	2.25	1.26	43.01
June 24	1 hammer	4.05		
	1 string line	.21	.13	4.39
June 25	2x6 #2 80' (ret)	8.80		8.80
June 30	100 concrete brick	2.80	.09	2.89
June 30	5/0 rfg. rod 700'	98.00	2.94	100.94
June 30	1x4 #2 S4S 10'	1.96	.06	2.02
June 30	1 Shovel	4.75	.14	4.89
July 1	10 sacks mm	12.00		
	1 roll 15# Felt	2.35	.43	14.78
July 1	136x96 flat sheet	3.40		
	2x8 #2	1.76		
	2x4 #2	1.37		
	1 pc hardware cloth	2.76	.28	9.57
July 1	5/8 rfg. rod 80'	11.20	.34	11.64
July 1	1 load bldg. sand	12.50	.38	12.88
July 2	130 8x8x8 block	20.80		
	1150 8x8x16 "	276.00		
	5/8 rfg. rod 20'	2.20	8.98	308.58
July 3	Visqueen 360'	7.20	.22	7.42
July 5	10 sacks mm	12.00		
	5/8 rfg. rod	14.00		
	2 rolls 15# felt	4.70	.92	31.62
July 7	1 steel brush	.45		
	2 hack saw blades	.30		
	1 stick Keil	.10		
	1 trowel	.30		
	1 hack saw	2.90		
	2 rolls keynall	13.80	.54	18.39
July 7	12 sacks mm	15.60		
	1/2" rfg. rod .160'	14.40		
	3/8 rfg. rod 60'	3.60		
	1/2 yd gravel	1.44		
	3/8" pipe 4'	.52	1.07	36.63
July 9	4 #24 Jal. Windows	64.60		
	3 mullions	7.75		
	1 pr. fins	2.25	2.24	76.84
July 9	1x8 S4S 77'	8.08		
	5# 8d common	.80		
	2x1 1/2 reducers 2	3.60	.38	12.86
July 10	1 load bldg. sand	12.50		
	1/2 yd. gravel	3.00		
	4" brush	1.75		
	1/2x10 found bolts	11.00		
	1/2 washers	1.20		
	5 gal. wood preserver	7.95		
	18 sacks brickmortor	21.60	1.77	60.77

Date	Item	Cost	Tax	Total
July 10-58	170 8x8x8 block	\$27.20		
	1850 8x8x16 "	444.00	14.14	485.34
July 11	1 ch bolts	.20		
	1 post hole digger	2.10	.07	2.37
July 11	2x8 #2 30/1645/106/14	138.62		
	2x10 #2 156/10	270.40		
	1x8 S4S #2 80'	7.60		
	1x6 cm #2 3750'	356.25		
	100# 8d common	12.75		
	100#16d common	12.75		
	10 # 6d common	1.60	24.00	823.97
July 14	1 Axe	5.60		
	12 Vtip 25'	4.00	.29	9.89
July 14	7 gal. pine wood pre.	11.15	.34	11.49
July 15	2x8 #2 200'	20.00	.60	20.60
July 15	2x8 #2 128'	13.44		
	1x6 #2 60'	5.80		
	Ship Auger bit (ret)	2.75		
	Invoice #12432 error	63.00	2.39	81.88
July 15	12 v tin 100'	16.00		
	1 hammer	1.79	.54	18.33
July 15	1/2 x10 m bolts	3.06		
	1/2 x9 m bolts	2.10	.16	5.32
July 17	1x4 #2 192'	19.82		
	20# 20d common	3.00		
	2x8 #2 432'	47.52		
	2x4 #2 307'	34.72	3.12	107.18
July 19	4 sacks cement	5.40		
	1/2 yd. gravel	2.88	.25	8.53
July 23	2x10 1067'	116.30		
	10 sack mm	12.00	3.85	132.15
July 23	1x4 #2 17'	1.79		
	2x6 #2 24'	2.47		
	2x8x2 50"	52.61		
	2x10 575'	62.70		
	3/8 rfg. rod 100'	6.00		
	1/2 x10 ch bolts	5.60		
	1/2 washers	.20		
	11 foundation griles	13.86	4.36	149.59
July 24	28" galv. screen 25'	5.28		
	6x6 mesh	.56		
	1x6 44'	4.62		
	1x8 48'	5.24		
	2x6 60'	6.48		
	10# plastic cement	.95		
	3/4 rfg. nails 10#	2.50	.77	26.40
July 25	1x6 #2 28'	2.94		
	1x8 #2 373'	3.92		
	4x8x8 blocks	3.60	.32	10.78
July 28	10 sacks mm	12.00		
	2x6 #2 102'	12.96	.75	25.71
July 30	20 sacks mm	24.00	.72	24.72
July 30	1 scotties	.35	.01	.36
July 31	3 gal pine wood	4.80	.15	4.95
July 31	5/8 ext. bit	2.75		
	1/2 x24 Bolts	1.20		
	3/8 x22 Bolts	1.10		
	1/2 washers	.08	.16	5.29
July 31	3/8 AA 4x14	23.08		
	3/8 AA 4x12	21.76		
	1/2 AA 4x16	18.96		
	5/8x4x14 #1	1.83		
	1x6 #1	20.06		
	1x4 #1	3.84		
	1x10	1.53		
	1x12	1.98	2.79	95.83
Aug. 1	1 load sand	12.50	.38	12.88
Aug. 1	6 cement	8.10	.24	8.34
Aug. 1	1000 8x8x16	240.00		
	100 4x8x16	17.00		
	10 4x8x8	1.20	7.75	265.95

Date	Item	Cost	Tax	Total
Aug. 4	2x10 #2 417'	45.45	1.37	46.82
Aug. 5	1 ball string	.48	.02	.50
Aug. 5	1/2x10 galvo.cge bolts	24.30		
	1/2 cut jack washers	.76	.75	25.81
Aug. 7	10 4x8x8	1.30		
	10 8x8x16	2.70		
	1x6 Td.G	84.00		
	10# 8d common	1.60		
	Roll Key wall	6.90		
	5 sacks mm	6.50		
	Post hole auger	7.20		
	3/4 pipe 8'	1.68		
	3/4 coupling	.44	3.38	115.70
Aug. 8	2x10 #2 140'	15.95		
	1 yd. gravel	6.75	.68	23.38
Aug. 8	1 pr. strap hinges	.55	.02	.57
Aug. 8	8x8x16 --	72.00		
	85 4x8x16 --	14.45		
	10 4x8x8 --	1.20		
	handling charge	2.50		85.15
Aug. 12	225 8x4x16	38.25		
	30 8 4x8	3.60		
	10 sacks Brickmortor	12.00		
	10 sacks cement	13.50		
	1/2 rfg. rods 100'	9.00		
Aug. 13	5/8 rfg/ rps. 200'	28.00	3.13	107.48
	8" masonry bead	4.38		
	hack saw blades	1.50		
	2" galv. pipe 85'	53.53	1.78	61.19
Aug. 26	Error corrected	63.00		63.00
			TOTAL	3432.47

Paid on Account  
 July 1, 1958-- 399.66  
 Aug. 19, " -- 1,000.00  
 Sept. 3, " 300.00  
 Sept. 9, " 100.00  
1,799.66

Credit memo. Aug. 14, 1958  
 4 Jalousie Windows  
 3 Mullians  
 1 Fin

69.16  
1,868.82

1,868.82

BALANCE DUE AS OF THIS DATE - -

\$1563.65

STATE OF ALABAMA  
 BALDWIN COUNTY

I, [Signature], A Notary Public, in and for said State and County, hereby certify that personally appeared before me William West, and who by me being first duly sworn, doth depose and say; that the above itemized of the account of Georgia Ramsey is true and correct.

[Signature]  
 William West

Sworn to and subscribed before me on this the 28 day of October, 1958.

[Signature]  
 Notary Public.

EXHIBIT "B"

STATE OF ALABAMA  
COUNTY OF BALDWIN

BYRD L. MOORE and WILLIAM WEST, a partnership, d/b/a MOORE SUPPLY COMPANY, files this statement in writing, verified by the oath of BYRD L. MOORE, who has personal knowledge of the facts herein set forth:

That said MOORE SUPPLY COMPANY claims a lien upon the following building, to wit: Paradise Beach Casino, located upon the following described property situated in Baldwin County, Alabama, to wit:

From the Southeast corner of Section Five (5), Township Five (5) South, Range Two (2) East, run South Eighty (80) Links to the Northeast corner of Lot Three (3) of the Louis Dolive Estate Division; thence run West along the North Line of said Lot Three (3), 149.31 Chains to the Northeast corner of the property formerly owned by Mary Ella Crisostusno for a point of beginning; thence run East Thirty-eight and nine tenths (38.9) Feet; thence run South One Hundred sixteen (116) Feet; thence run North eighty-nine (89) degrees forty (40) minutes East Four Hundred (400) Feet; thence run South 00degrees 20 feet East 130 Feet to a point in the South fence line of the Quinney property; thence run South 89 degrees 40 Feet West 438 Feet; thence run north 249.5 feet to the point of beginning, containing one and two-fifths (1 2/5) acres in Dolive Grant Section 7, Township 5 South, Range Two East, Baldwin County, Alabama.

This lien is claimed as to both the buildings and improvements thereon, on the said above described property.

That said lien is claimed to secure and indebtedness of ONE THOUSAND SIX HUNDRED THIRTY TWO and 81/100(\$1,632.81) with interest, from to-wit, the 19th day of August, 1958, for the materials used in the construction of the said building located on the above described property.

The name of the owner or proprietor of the said property is Georgia Ramsey, d/h/a Paradise Beach Casino.

MOORE SUPPLY COMPANY

STATE OF ALABAMA, BALDWIN COUNTY  
Filed 9-16-58 11:45 A.M.  
Recorded Ex & Lien Book 5 Page  
295-6  
W. R. Stuart-Judge of Probate

By: /s/ Byrd L. Moore  
Partner

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, JOHN V. DUCK, a Notary Public, in and for the County of Baldwin, State of Alabama, personally appeared Byrd L. Moore, who being duly sworn, doth depose and say; that he has personal knowledge of the facts set forth in the fore going statement of lien, and that the same are true and correct to the best of his knowledge and belief.

\_\_\_\_\_  
Affiant

Subscribed and sworn to before me on this the \_\_\_\_\_ day of \_\_\_\_\_, 1958, by said affiant.

\_\_\_\_\_  
Notary Public



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The 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 GEORGIA RAMSEY, Ind. AND d/b/a

PARADISE BEACH CASINO

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 .....

GEORGIA RAMSEY, Ind. and d/b/a Paradise Beach Casino, Defendant.....

by BYRD L. MOORE AND WILLIAM WEST, a partnership d/b/a

MOORE SUPPLY COMPANY, Plaintiff.....

Witness my hand this 29 day of Oct 19 58

*Executed Nov. 5, 1958*

*By Hon. C.S.*

*David J. Alcock*, Clerk

The State of Alabama  
Baldwin County

CIRCUIT COURT

BYRD L. MOORE AND WILLIAM

WEST, a partnership d/b/a  
MOORE SUPPLY CO. Plaintiffs  
vs.

GEORGIA RAMSEY, Ind. and  
d/b/a PARADISE BEACH CASINO  
Defendants

Summons and Complaint

Filed **FILED** \_\_\_\_\_ 19\_\_\_\_  
**OCT 29 1958**  
ALICE J. DUCK, CLERK-REGISTER  
Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

10/30 1958

\_\_\_\_\_, Sheriff

I have executed this summons

this 5 Nov 1958

by leaving a copy with

Georgia Ramsey

Sheriff claims 54 miles at  
Ten Cents per mile Total \$ 5.40  
TAYLOR WILKINS, Sheriff  
BY Taylor Wilkins  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

[Signature] Deputy Sheriff

Daphne

BYRD L. MOORE AND  
WILLIAM WEST, A  
partnership, d/b/a  
MOORE SUPPLY COMPANY

COMPLAINANTS

VS

GEORGIA RAMSEY, IND. and  
d/b/a PARADISE BEACH CASINO

RESPONDENTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 4420

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and for grounds therefor says as follows:

1.

There is no equity in the bill.

2.

The lien filed in the Probate Court on which this claim is based is not drawn with sufficient particularity.

3.

The verification of the lien on which this suit is based is not in proper form.

4.

The Complaint fails to allege what tract of land he is claiming a lien on.

5.

The Complainant is seeking a lien on the land in excess of the amount allowed by law.

Wilters & Brantley

BY: Albert M. Brantley  
Solicitors for the Respondent

The Respondent requests a trial by jury.

*filed Nov. 24, 1958*  
*Alice J. Luck, Reg.*

Wilters & Brantley

BY: Albert M. Brantley  
Solicitors for the Respondent

40  
7/14  
40  
560

4420

BYRD L. MOORE AND WILLIAM WEST,  
a partnership, d/b/a MOORE  
SUPPLY COMPANY

COMPLAINANT

VS

GEORGIA RAMSEY, INC. and  
d/b/a PARADISE BEACH CASINO

RESPONDENT

DEMURRERS

FILED

NOV 24 1958

ALICE J. DUCK, Register