

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH JUDICIAL CIRCUIT
OF ALABAMA

BAY TOWING AND DREDGING
COMPANY, INC., a corpora-
tion,

Plaintiff,

vs.

GEORGE ARGIRO and
MANUEL CLIKAS,

Defendants.

AT LAW NO. 1787

COMPLAINT

COUNT ONE. Plaintiff claims of the defendants the sum of, to-wit, Two Thousand, Nine Hundred Forty And 83/100 (\$2,940.83) Dollars, together with interest thereon for work and labor done by the plaintiff at the request of defendants on the following described real property, to-wit:

All of that portion of Fractional Section 20, Township 4 South, Range 1 East of St. Stephens Meridian which lies South of the right of way of the Cochrane Bridge Roadway,

Except:

All that portion of fractional Section 20, Township 4 South, Range 1 East more particularly described as follows:
From the center of Fractional Section 30, Township 4 South, Range 2 East, run south 259 feet to the North side of the pavement on Alabama State Highway No. 31, thence Westwardly along said pavement to its intersection with U. S. Highway No. 90, thence continue Westwardly along said Highway, 28,133.7 feet to a point in the Eastern point of a marsh at the mouth of Tensaw River; thence Southwardly and at right angles to the right of way line of said Highway to the point which is 150 feet Southwardly from the center line of said Highway, being on the South line of the right of way thereof, for the point of beginning; said point being also 27,557.1 feet West and 3851.7 feet North from the said center of said Section 30; said point also being 2953.5 feet Eastwardly from the Eastern end of the concrete slab on the roadway on Tensaw-Spanish River Bridge or Span on said Highway #90 (measured along the North side of the pavement strip of said Highway and

160 feet Southward from the North line of said pavement, measured along a line at right angles thereto) and from said point of beginning thence run Westwardly along the South right of way line of said Highway #90, 300 feet to a point; thence run Southwardly and at right angles to said right of way line 175 feet, more or less, to the Northerly shore line of Mobile Bay; thence run Eastwardly along the meanderings of said shore line of Mobile Bay 330.3 feet, more or less, to a point, where a line, running Southwardly and at right angles to said right of way line from the point of beginning would intersect said Northerly shore line, thence running Northwardly along the last described course 314 feet, more or less, to the place of beginning. All of said measurements being according to a survey by Durant Engineering Company dated September 9, 1949 and revised in April of 1950.

which said indebtedness accrued on, to-wit, the 19th day of October, 1951 and is now due and unpaid.

Plaintiff alleges that the above described property is the property of the defendants; that said work and labor was done on said land under and by virtue of a contract between the plaintiff and the defendants; that within six (6) months after the said indebtedness had matured, plaintiff filed in the office of the Judge of Probate of Baldwin County, Alabama, wherein the land is situated, a verified statement as required by law.

WHEREFORE, plaintiff claims a lien for said amount upon said land and the improvements situated thereon.


Attorneys for Plaintiff

Defendants' Address

Sea Ranch
Cochrane Bridge Causeway
Baldwin County, Alabama

Mr. George Argiro
564 S. Conception St.
Mobile, Alabama

Mr. Manuel Clikas
301 Dexter Avenue
Mobile, Alabama

Received in Sheriff's Office
this 8 day of April 1952
TAYLOR WILKINS, Sheriff

By W. H. H. [Signature] Sheriff
By W. H. H. [Signature] Sheriff

Received 11 Day of April 1952
and on 12 Day of April 1952
I served a copy of the writ on Manuel Clikas
on Manuel Clikas
by service on Manuel Clikas

AT LAW NO. 1787

WV
RECORDED

BAY TOWING AND DREDGING CORPORATION, INC., a corporation,

Plaintiff,

vs.

17 Jan 18 Jan
GEORGE ARGIRO and MANUEL CLIKAS,

Defendants.

COMPLAINT

FILED
APR 8 1952
ALICE A. BUCH, Clerk

VICKERS AND THORNTON
ATTORNEYS AT LAW
MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA

CSU

Printed by The Baldwin Times, Bay Minette, Ala.

Bay Minette, Ala., April 8, 1952

To the Sheriff of Mobile County,
Mobile, Alabama.

I enclose herewith

Copy for Bro. J. J. - 5645
Remington St. & Morgan St. -
301 West St., Mobile

Please serve and return as early as possible.

Raymond Williams
Sheriff, Baldwin County, Alabama.

(If not found in your county please advise promptly giving information as to present location, if possible)

VICKERS AND THORNTON

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

MARION R. VICKERS
J. EDWARD THORNTON

April 7, 1952

Mrs. Alice Duck
Circuit Clerk
Bay Minette, Alabama

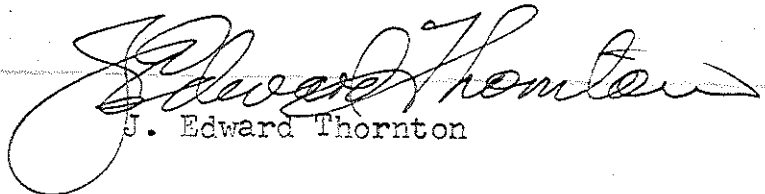
Dear Mrs. Duck:

We are herewith enclosing an original and two copies of a complaint in the case of Bay Towing Dredging Company, Inc. v. George Argiro and Manuel Clikas which we would appreciate your filing for us.

We would also appreciate it if you would acknowledge receipt on the enclosed copy of this letter.

Yours very truly,

VICKERS AND THORNTON



J. Edward Thornton

JET:mb

Encls.

1787

Buy Towing Tredging
inc - at corp 18

vs.

George Argist
Manuel Clikar

701 Labr

Filed 4-8-52

VICKERS AND THORNTON

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

MARION R. VICKERS
J. EDWARD THORNTON

October 4, 1952

Mrs. Alice Duck
Circuit Clerk
Bay Minette, Alabama

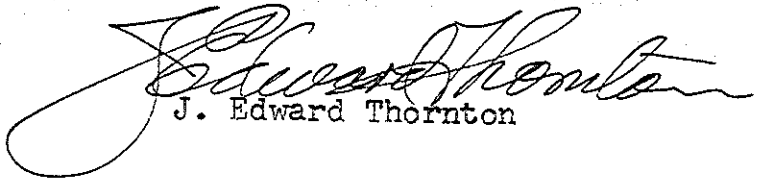
Dear Mrs. Duck:

Bay Towing & Dredging Company v. George Argiro
and Manuel Clikas - No. 1787

We are herewith enclosing your cost bill together with
our check for \$12.55 in satisfaction thereof. Will
you please have the judge enter an order dismissing
this case for us.

Yours very truly,

VICKERS AND THORNTON


J. Edward Thornton

JET:mb

Encl.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA.

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1787

...TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon George Argiro and Manuel Clikas

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 _____

George Argiro and Manuel Clikas Defendant _____

by Bay Towing and Dredging Company, Inc., A Corp

- Plaintiff.....

Witness my hand this 8th day of April 1952

— Clerk

No. 1787 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

BAY TOWING AND DREDGING COMPANY

Ino., A Corp

Plaintiffs

vs.

GEORGE ARGIRO and MANUEL CLIKAS

Defendants

SUMMONS and COMPLAINT

Filed 4-8, 19 52

W. J. ..., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19.....

, Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

Sheriff

Deputy Sheriff