

THE STATE OF ALABAMA,
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, Gus Gulas

Eunice B. Blackmon
hath complained on oath to me, ~~ALICE J. DUCK~~, Clerk of Circuit Court of Baldwin County, Ala., that
Betty Frizzell and Rembrandt Paint Factory, Inc., a Corporation

is justly indebted to the Plaintiff Sea Ranch Properties, Inc., a Corporation

in the sum of Four Thousand Nine Hundred Fifty (\$4,950) Dollars, and
Gus Gulas and Plaintiff

having made affidavit and given bond
as required by law, in such cases, you are hereby commanded to attach so much of the estate of
Betty Frizzell and Rembrandt Paint Factory, Inc., a
Corporation

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said
County, on _____ Monday of _____ 19 ____
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 15 day of Oct A. D., 1921.

Eunice B. Blackmon Clerk.

OCT 15 1971

TAYLOR WILKINS
SHERIFF

No. 10,075

ATTACHMENT

*Sea Ranch Properties
Inc. a corp.*

Vs. { ATTACHMENT

*Betty Trizzell &
Rembrandt Paint
Factory.*

Issued Oct 15, 1971

Moore Printing Co.,

OCT 18 1971

TAYLOR WILKINS
SHERIFF

Oct. 15, 1971

Attachment Executed by posting on front
door of Rembrandt Paint Factory and
Harbor Inn. The defendant having
secereted her self and place of
residence not known.

Taylor Wilkins
Sheriff

by: *J.M. Byrd*
Deputy Sheriff

Received _____ day of _____ 19____
and on 19 day of Oct 1971
I served a copy of the within attch.
on Betty Trizzell
By service on Betty Trizzell

TAYLOR WILKINS, Sheriff
By W. J. Cook D.S.

Sheriff claims 100
Ten Cents per mile Total 10.00
TAYLOR WILKINS, Sheriff
BY Cook Deputy Sheriff

104
364
69

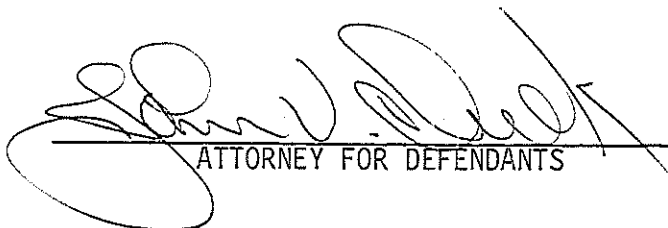
SEA RANCH PROPERTIES, INC.,)
a corporation,)
Plaintiff,)
vs.)
BETTY FRIZZELL and REMBRANDT)
PAINT FACTORY, INC., a)
corporation,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 10,075

DEMURRER

Comes now the Defendants in the above styled cause, and demurs to the Bill of Complaint filed herein, and for grounds thereof, assigns the following separately and severally:

1. That said Bill of Complaint does not state a cause of action.
2. That said Bill of Complaint fails to allege whether the alleged rent owed is under a written or an oral lease.
3. That said Bill of Complaint fails to allege a default in the payments of said rent.


ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 10 day of November 1971

Attorney for Defendants

FILED

NOV 12 1971

EUNICE B. BLACKMON CIRCUIT CLERK

THE STATE OF ALABAMA {
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALA.

KNOW ALL MEN BY THESE PRESENTS, That We, Sea Ranch Properties,
Inc., a Corporation and Gus Gulas

....., of the County of Baldwin

are held and firmly bound unto Betty Frizzell and Rembrandt Paint Factory,
Inc., a Corporation

in the sum of Dollars, to

be paid to the said
heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind our-
selves and each of us, our and each of our heirs, executors and administrators, jointly and severally, firmly
by these presents.

Sealed with our seals and dated the day of, 19

The Condition of this Obligation is such:

That whereas, the above bounden Sea Ranch Properties, Inc., a Corporation

..... ha.S, on the day of the date

hereof, prayed an Attachment at the suit of Sea Ranch Properties, Inc., a CorporationPlaintiff

..... against the estate of above named

Betty Frizzell and Rembrandt Paint Factory, Inc., a Corporationfor the sum of Four Thousand Nine Hundred Fifty (\$4,950) Dollars,
and hath obtained the same, returnable to the Circuit Court of Baldwin County:Now, if the said Sea Ranch Properties, Inc., a Corporationshould prosecute said Attachment to effect, and pay the said Defendant all such damages as
may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be
void; otherwise to remain in full force and effect.And we and each of us hereby waive all rights of claims of exemption we or either of us have now,
or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

Gus Gulas (Seal)Sea Ranch Properties, Inc. (Seal)E. B. Seay (Seal)W. H. Hay (Seal)Approved, this 15 day of Oct, 19 71Ernie B. Blackburn, Clerk

THE STATE OF ALABAMA {
Baldwin County

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, W. Lee Hays
 in and for said County, personally appeared Gus Gulas
 who, being duly sworn, on oath saith that Betty Frizzell and Rembrandt Paint
Factory, Inc., a Corporation justly indebted to

Sea Ranch Properties, Inc., a Corporation

in the sum of Four Thousand Nine Hundred Fifty (\$4,950) Dollars,

which said amount is justly due after allowing all just offsets and discounts, and that the said

debt is for rent on demise and the said Betty Frizzell and

Rembrandt Paint Factory, Inc. are about to abscond or remove the
 content of the demise and dispose of the same.

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

Gus Gulas
 Gus Gulas

Subscribed and sworn to before me this 15 day of Oct, 19 71

W. Lee Hays

No. _____	Page _____
STATE OF ALABAMA Baldwin County	
CIRCUIT COURT At Bay Minette, Ala.	
TO	
ATTACHMENT BOND AND AFFIDAVIT	
Filed this the _____ day	of _____, 19 _____
OCT 15 1971	
EUNICE B. BLACKMON	Clerk
Attorney	

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Betty Frizzell and Rembrandt Paint Factory, Inc., a Corporation to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of Sea Ranch Properties, Inc., a Corporation.

Witness my hand this 15 day of October, 1971.

Ernie B. Blackman
Clerk

SEA RANCH PROPERTIES, INC., Ø IN THE CIRCUIT COURT OF
A Corporation,

Plaintiff, Ø BALDWIN COUNTY, ALABAMA

Vs. Ø AT LAW

BETTY FRIZZELL and REMBRANDT Ø
PAINT FACTORY, INC., A
Corporation, Ø


NUMBER: _____

Defendant. Ø

The Plaintiff claims of the Defendants Four Thousand
Nine Hundred Fifty and No/100 (\$4,950.00) Dollars, the rent of
a tract of land and a building, viz:

The Old Silver King building and Silver
King Parking lot.

demised by the Plaintiff to the Defendants on the 22 day of
December, 1970, said rent commencing on the 22nd day of December,
1970 and ending on the 15th day of October, 1971.



Attorney for Plaintiff
Wilson Hayes

FILED

OCT 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

OCT 15 1971

TAYLOR WILKINS
SHERIFF

Received _____ day of _____ 1971
and on _____ day of _____ 1971
I served a copy of the within _____
on Betty Frizzell
By service on Betty Frizzell
Rembrandt Paint
TAYLOR WILKINS, Sheriff
By W. B. Blackmon D. S.
Ten Cents per mile Total \$ 20.00
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF W. B. Blackmon

100 miles
2 times

10,075
Sea Ranch Properties,
Inc. a corp.

vs.
Betty Frizzell &
Rembrandt Paint
Factory, Inc. a corp.

FILED

OCT 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Wilson Nayer

FEIBELMAN & SILVER

ATTORNEYS AT LAW

2103 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA 36601

HERBERT P. FEIBELMAN, JR.
IRVING SILVER

P. O. BOX 2082
TELEPHONE 205 433-1597

March 10, 1972

Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Sea Ranch Properties, Inc.
Vs: Bettye Frizzell, et al
Case No. 10,075

and

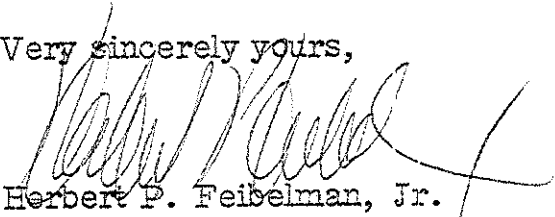
Re: Coastal Concrete Co.
Vs: Bettye Frizzell
Case No. 10,168

Gentlemen:

The Defendant in the above cases, Bettye Frizzell, filed a petition in Bankruptcy in the United States District Court for the Southern District of Alabama, Southern Division, on the 10th day of March, 1972, Case No. 32,651 .

Please accept this as her motion to stay and suggestion of Bankruptcy.

Very sincerely yours,


Herbert P. Feibelman, Jr.

hpf/srr

cc: Messrs. Wilters, Brantley & Nesbitt
Mr. Wilson Hayes
Mr. John Courtney

Wilson

MEMO-LETTER

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Eunice Blackmon
Bay Minette, Ala.

DATE

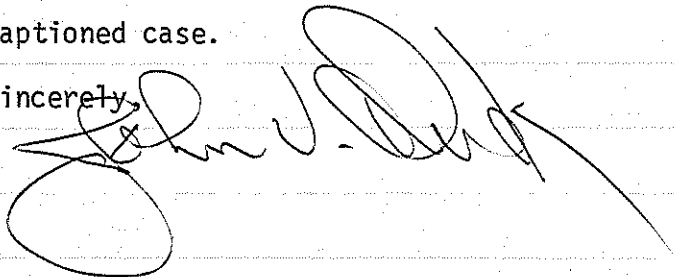
DATE November 10, 1971

Re: Sea Ranch Properties, Inc. vs. Betty
Frizzell & Rembrandt Paint Factory, Inc.
Civil Case No. 10,075

Dear Mrs. Blackmon:

Enclosed please find Demurrer to be filed in
captioned case.

Sincerely,



SIGNED

SIGNED