JOHN D. RICHARDSON, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama,	)	IN THE CIRCUIT COURT
	)	OF
PLAINTIFF,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
BAYSIDE MOTEL CORPORATION, A Corporation,	)	Case No. 3899
	)	
DEFENDANT.	)	

ONE

The Plaintiff claims of the Defendant $2,753.00 due from the Defendant by account on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

TWO

The Plaintiff claims of the Defendant $2,753.00 by account stated on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

THREE

The Plaintiff claims of the Defendant $2,753.00 for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

FOUR

The Plaintiff alledges that between, towit, June 1, 1958 and June 27, 1959, during which time the services rendered and materials furnished were a continuous operation, the Plaintiff sold, planted and furnished to the Defendant, at his request, certain plants, shrubbery, grass, trees and other materials and did certain landscape work in the beautification of the following property of the Defendant, situated in the County of Baldwin, State of Alabama, and more particularly described as follows, to-wit:-

Parcel I

Commencing at a point on the North line of U.S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River thence run South 79° 04' E. along the North line of U.S. Highway 90, 3,272 feet to the point of beginning of the property herein described which point is 200 feet eastwardly measured along the North line of said highway from the S.W. Corner of Parcel 6, according to a survey of Pineda Island, attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, Pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence continue along North line of said highway South 79° 04' E. 200 feet to a point, thence run N. 10° 56' E. 404.23 feet, thence run North 43° 00' W. 162.68 feet thence run North 79° 04' West 268.50 feet to a point on the East line of a private

road, thence along East line of said road run South 10° 56' W, 300 feet thence run South 79° 04' East 200 feet, then run South 10° 56' West 200 feet to the point of beginning, being a portion of Parcel 6 mentioned above.

Parcel II

Commencing at a point on the North line of U. S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River, thence run South 79° 04' East along North line of U. S. Highway 90, 3,476.1 feet to the point of beginning of the property herein described which point is 404.1 feet eastwardly measured along North line of said highway from the S. W. corner of Parcel 6, according to a survey of Pineda Island attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence run 10° 56' East 150 feet thence South 79° 4' East 150 feet, thence north 10° 56' East 200 feet, thence North 79° 4' west 154.1 feet, thence South 10° 56' west 350 feet, thence South 79° 4' East 4.1 feet to the point of beginning, said land containing 0.7 acres more or less.

Sections 13-14-23-24 4 S 1

Plaintiff further avers that on towit, July 10, 1959, he filed in the office of the Judge of Probate of Baldwin County, Alabama, a verified statement as required by statue of the amount due the Plaintiff for the said work and labor, material, supplied, trees, grass and plants so furnished after all just credit had been given together with a true description of the property on which Plaintiff claims a lien, a copy of which said statement is attached hereto as Exhibit A and made a part hereof.

Plaintiff further avers that the Defendant is indebted to the Plaintiff in the sum of $2,753.00, with interest thereon, due from the Defendant by account on towit the 27th. day of June 1959 for the said work and labor, material, supplied, trees, grass and plants so furnished, which sum of money, with the interest thereon, is due and unpaid.

WHEREFORE Plaintiff brings this action for said sum and to enforce his said lien.

J. G. Bennett

J. G. Bennett, Atty.for Plaintiff.
P. O. Box 4154,
Mobile, Ala.

Defdt's Address:-

Holiday Inn Motel,
Bay Bridge Causeway.
Baldwin County, Ala.

Please serve on an official of the corporation.

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Exhibit A.

John D. Richardson, doing business in Mobile County, Alabama, as Richardson Grass Farm, files this statement in writing, verified by his oath, who has personal knowledge of the facts herein set forth:-

That the said John D. Richardson claims a lien on the following property situated in the County of Baldwin, State of Alabama, and more particularly described as follows to-wit:-

Parcel I

Commencing at a point on the North line of U.S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River thence run South 79° 04' E. along the North line of U.S. Highway 90, 3,272 feet to the point of beginning of the property herein described which point is 200 feet eastwardly measured along the North line of said highway from the S.W. Corner of Parcel 6, according to a survey of Pineda Island, attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, Pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence continue along North line of said highway South 79° 04' E. 200 feet to a point, thence run N. 10° 56' E. 404.23 feet, thence run North 43° 00' W. 162.68 feet thence run North 79° 04' West 268.50 feet to a point on the East line of a private road, thence along East line of said road run South 10° 56' W, 300 feet thence run South 79° 04' East 200 feet, then run South 10° 56' West 200 feet to the point of beginning, being a portion of Parcel 6 mentioned above.

Parcel II

Commencing at a point on the North line of U. S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River, thence run South 79° 04' East along North line of U. S. Highway 90, 3,476.1 feet to the point of beginning of the property herein described which point is 404.1 feet eastwardly measured along North line of said highway from the S.W. corner of Parcel 6, according to a survey of Pineda Island attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, page 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence run 10° 56' East 150 feet thence South 79° 4' East 150 feet, thence north 10° 56' East 200 feet, thence North 79° 4' West 154.1 feet, thence South 10° 56' west 350 feet, thence South 79° 4' East 4.1 feet to the point of beginning, said land containing 0.7 acres more or less.

Section 13-14-23-24 4 S 1

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

That said lien is claimed to secure an indebtedness of $2,753.00, with interest thereon, from towit the 27th. day of June 1959 being the amount due for the said work and labor, material supplied, trees, grass and plants so furnished, by the undersigned John D. Richardson, doing business as Richardson Grass Farm in Mobile County, Alabama, to Bayside Motel Corporation and used for the beautification of said property.

The name of the owner or proprietor of the said property is BAYSIDE MOTEL CORPORATION, A Corporation.

By:- John D. Richardson
John D. Richardson, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama.

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, J. Gordon Bennett, a Notary Public in and for the County of Mobile, State of Alabama, personally appeared John D. Richardson, who after being duly sworn, doth depose and say that he has personal knowledge of the facts set forth in the foregoing instrument of lien, and that the same are true and correct to the best of his knowledge and belief.

John D. Richardson
AFFIANT

Subscribed and sworn to before me on the 10th. day of July, 1959.

J. Gordon Bennett
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

RICHARDSON GRASS FARM

ST. AUGUSTINE, CENTIPEDE, ZOYSIA LAWN GRASSES

2201 ROBINSON DRIVE

TEL. GR 9-4602

MOBILE, ALABAMA

WHOLESALE & RETAIL

Work performed and material used in landscaping Holiday Inn Motel on Mobile Bay Causeway.

Top soil	19 loads	@	11.00		$ 209.00
Fill dirt	3 "	@	8.00		24.00

Plants:

367 Boxwood plants	@	$1.25	$ 458.75	
Assorted smaller inside	@		28.00	
2 large inside	@	19.00	38.00	
2 " Arborvita	@	2.50	5.00	
12 "	@	1.50	18.00	
4 "	@	1.25	5.00	
4 large azaleas	@	6.00	24.00	
3 medium "	@	4.00	12.00	
34 semi-dwarf azaleas	@	1.25	42.25	
12 dwarf "	@	1.00	12.00	
4 Palms	@	7.50	30.00	
12 Assorted large plants placed in front of Motel	@	4.50	54.00	
6 Assorted outside	@	1.25	7.50	
1 Sack rye grass seed			15.00	
20 rosebushes			18.00	
2 sacks 4-10-7 fertilizer	@	1.75	3.50	
225 yds St.Augustine sod	@	1.00	225.00	
570½ " " " " placed at house on Island in June of 1958 prior to work on Motel but all a part of contract			570.50	$ 1,566.50

Tractor 2 days @ $20.00 levelling grounds 40.00

Labor:

Taking up sod at Howard Johnson Restaurant, loading, hauling and placing at house, in motel patio and replacing at restaurant 1,060 yards @ 30¢ 318.00

Grading, spreading soil, planting shrubs, building putting green and planting grass in all areas about Motel grounds 595.50

Total $ 2,753.00

STATE OF ALABAMA)

COUNTY OF MOBILE)

Personally appeared before me the undersigned authority, John D. Richardson, who after being by me first duly sworn, deposes and says that he has personal knowledge of the account of BAYSIDE MOTEL CORPORATION, A Corporation, due the affiant; that the itemized statement attached hereto contains all of the charges and credits in connection with said account; that said account has been kept by your affiant personally and that the amounts shown on said itemized statement are just, true, correct, owing and unpaid and that there are no set-offs, counter-claims nor credits due on the said account except as shown on the said itemized statement.

John D. Richardson
AFFIANT

Subscribed and sworn to before me
on the 10th. day of July, 1959.

J. Lorson Rand
NOTARY PUBLIC, MOBILE COUNTY, ALA.

FILED

JUL 10 1959

ALICE I. DUCK, CLERK REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3899

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BAYSIDE MOTEL CORPORATION, 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 BAYSIDE MOTEL CORPORATION, A Corporation, Defendant by JOHN D. RICHARDSON, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama, Plaintiff

Witness my hand this 10 day of July 1959

Not Found

Alice J. Huck, Clerk

13A

cd 1684 RECORDED 412

No. 3899 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

JOHN D. RICHARDSON, d/b/a

RICHARDSON GRASS FARM in Mobile, County, Alabama
Plaintiffs

vs.

BAYSIDE MOTEL CORPORATION, A Corporation
Defendants

Summons and Complaint

Filed July 10 19 59

Alice J. Dukk Clerk

in Bald Co

Plaintiff's Attorney

Defendant's Attorney

458 Lake Street
Bay Minette Alabama

Defendant lives at

Received In Office

19 59

, Sheriff

I have executed this summons

this 19

by leaving a copy with

Bayside Motel Corp.

Returned 15 day of Dec 195

Not found in my county after diligent search and quiry.

Taylor Wilkins, Sher

By Stadham
Deputy Sheri

RETURNED 7-30-59

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By H. B. Brownell D.S.

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3899

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BAYSIDE MOTEL CORPORATION, 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 BAYSIDE MOTEL CORPORATION, A Corporation, Defendant by JOHN D. RICHARDSON, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama, Plaintiff

Witness my hand this 10 day of July 19 59

Alice J. Duck, Clerk

No. 3899 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

JOHN D. RICHARDSON, d/b/a

RICHARDSON GRASS FARM in Mobile, County, Alabama

Plaintiffs

vs.

BAYSIDE MOTEL CORPORATION, A Corporation

Defendants

Summons and Complaint

Filed July 10 19 59

Alice J. Dukk 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

JOHN D. RICHARDSON, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama,	)	IN THE CIRCUIT COURT
	)	OF
PLAINTIFF,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
BAYSIDE MOTEL CORPORATION, A Corporation,	)	Case No. 3899
	)	
DEFENDANT.	)	

ONE

The Plaintiff claims of the Defendant $2,753.00 due from the Defendant by account on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

TWO

The Plaintiff claims of the Defendant $2,753.00 by account stated on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

THREE

The Plaintiff claims of the Defendant $2,753.00 for merchandise, goods and chattels sold by the Plaintiff to the Defendant on the 27th. day of June 1959, which sum of money, with the interest thereon, is due and unpaid.

FOUR

The Plaintiff alledges that between, towit, June 1, 1958 and June 27, 1959, during which time the services rendered and materials furnished were a continuous operation, the Plaintiff sold, planted and furnished to the Defendant, at his request, certain plants, shrubbery, grass, trees and other materials and did certain landscape work in the beautification of the following property of the Defendant, situated in the County of Baldwin, State of Alabama, and more particularly described as follows, to-wit:-

Parcel I

Commencing at a point on the North line of U.S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River thence run South 79° 04' E. along the North line of U.S. Highway 90, 3,272 feet to the point of beginning of the property herein described which point is 200 feet eastwardly measured along the North line of said highway from the S.W. Corner of Parcel 6, according to a survey of Pineda Island, attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, Pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence continue along North line of said highway South 79° 04' E. 200 feet to a point, thence run N. 10° 56' E. 404.23 feet, thence run North 43° 00' W. 162.68 feet thence run North 79° 04' West 268.50 feet to a point on the East line of a private

road, thence along East line of said road run South 10° 56' W, 300 feet thence run South 79° 04' East 200 feet, then run South 10° 56' West 200 feet to the point of beginning, being a portion of Parcel 6 mentioned above.

Parcel II

Commencing at a point on the North line of U. S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River, thence run South 79° 04' East along North line of U. S. Highway 90, 3,476.1 feet to the point of beginning of the property herein described which point is 404.1 feet eastwardly measured along North line of said highway from the S. W. corner of Parcel 6, according to a survey of Pineda Island attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence run 10° 56' East 150 feet thence South 79° 4' East 150 feet, thence north 10° 56' East 200 feet, thence North 79° 4' west 154.1 feet, thence South 10° 56' west 350 feet, thence South 79° 4' East 4.1 feet to the point of beginning, said land containing 0.7 acres more or less. Sections 13-14-23-24 4 S 1

Plaintiff further avers that on towit, July 10, 1959, he filed in the office of the Judge of Probate of Baldwin County, Alabama, a verified statement as required by statue of the amount due the Plaintiff for the said work and labor, material, supplied, trees, grass and plants so furnished after all just credit had been given together with a true description of the property on which Plaintiff claims a lien, a copy of which said statement is attached hereto as Exhibit A and made a part hereof.

Plaintiff further avers that the Defendant is indebted to the Plaintiff in the sum of $2,753.00, with interest thereon, due from the Defendant by account on towit the 27th. day of June 1959 for the said work and labor, material, supplied, trees, grass and plants so furnished, which sum of money, with the interest thereon, is due and unpaid.

WHEREFORE Plaintiff brings this action for said sum and to enforce his said lien.

J. G. Bennett, Atty. for Plaintiff.
P. O. Box 4154,
Mobile, Ala.

Defdt's Address:-

Holiday Inn Motel,
Bay Bridge Causeway.
Baldwin County, Ala.

Please serve on an official of the corporation.

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Exhibit A

John D. Richardson, doing business in Mobile County, Alabama, as Richardson Grass Farm, files this statement in writing, verified by his oath, who has personal knowledge of the facts herein set forth:-

That the said John D. Richardson claims a lien on the following property situated in the County of Baldwin, State of Alabama, and more particularly described as follows to-wit:-

Parcel I

Commencing at a point on the North line of U.S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River thence run South 79° 04' E. along the North line of U.S. Highway 90, 3,272 feet to the point of beginning of the property herein described which point is 200 feet eastwardly measured along the North line of said highway from the S.W. Corner of Parcel 6, according to a survey of Pineda Island, attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, Pages 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence continue along North line of said highway South 79° 04' E. 200 feet to a point, thence run N. 10° 56' E. 404.23 feet, thence run North 43° 00' W. 162.68 feet thence run North 79° 04' West 268.50 feet to a point on the East line of a private road, thence along East line of said road run South 10° 56' W. 300 feet thence run South 79° 04' East 200 feet, then run South 10° 56' West 200 feet to the point of beginning, being a portion of Parcel 6 mentioned above.

Parcel II

Commencing at a point on the North line of U. S. Highway 90 distant 108 feet from and at right angles to the center line at the east end of the concrete (North Highway) bridge over the Apalachee River, thence run South 79° 04' East along North line of U. S. Highway 90, 3,476.1 feet to the point of beginning of the property herein described which point is 404.1 feet eastwardly measured along North line of said highway from the S.W. corner of Parcel 6, according to a survey of Pineda Island attached to deed from Causeway Improvement Co., Inc. to A. Stein, recorded in Deed Book 217, page 143-146 of the Probate Records of Baldwin County, Alabama, prepared by William B. Irby, Engineer and Surveyor, thence run 10° 56' East 150 feet thence South 79° 4' East 150 feet, thence north 10° 56' East 200 feet, thence North 79° 4' West 154.1 feet, thence South 10° 56' west 350 feet, thence South 79° 4' East 4.1 feet to the point of beginning, said land containing 0.7 acres more or less.

Section 13-14-23-24 4 S 1

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

That said lien is claimed to secure an indebtedness of $2,753.00, with interest thereon, from towit the 27th. day of June 1959 being the amount due for the said work and labor, material supplied, trees, grass and plants so furnished, by the undersigned John D. Richardson, doing business as Richardson Grass Farm in Mobile County, Alabama, to Bayside Motel Corporation and used for the beautification of said property.

The name of the owner or proprietor of the said property is BAYSIDE MOTEL CORPORATION, A Corporation.

By:- John D. Richardson
John D. Richardson, doing business as RICHARDSON GRASS FARM in Mobile County, Alabama.

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, J. Gordon Bennett, a Notary Public in and for the County of Mobile, State of Alabama, personally appeared John D. Richardson, who after being duly sworn, doth depose and say that he has personal knowledge of the facts set forth in the foregoing instrument of lien, and that the same are true and correct to the best of his knowledge and belief.

John D. Richardson
AFFIANT

Subscribed and sworn to before me on the 10th. day of July, 1959.

J. Gordon Bennett
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

FILED
JUL 10, 1959
ALICE J. DUCK, CLERK REGISTER

4B

Baldwin Co.

D. V. Williams
458 Govt. St
not here

try Holiday Inn
on causeway

FILED
JUL 10 1959
ALICE J. DUCK, CLERK
REGISTER

3900

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summonL. D. TUBERVILLE AND ALICE TUBERVILEE 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 JACK PONDER, d/b/a Ponder Company.

WITNESS my hand this the 10 day of July, 1959.

Alice J. Duck
Clerk

- -

JACK PONDER, d/b/a PONDER COMPANY	)	IN THE CIRCUIT COURT OF
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA,
VS	)	AT LAW
L. D. TUBERVILLE AND ALICE TUBERVILLE	)	
DEFENDANTS.	)	

1.

The Plaintiff claims of the Defendants FIVE HUNDRED NINETY NINE and 60/100 ($599.60) DOLLARS, due from them by account on the 1st day of May, 1959, which sum of money with the interest thereon is still unpaid.

Wilters & Brantley

FILED
JUL 10 1959
ALICE J. DUCK, CLERK REGISTER

BY: Gary J. Wilters, Jr.
Attorneys for the Plaintiff

3900

Received 13 day of July 1959
and on 14 day of July 1959
I served a copy of the within Bill of Compt.
on L. D. Tuberville
Alice Tuberville
By service on

TAYLOR WILKINS, Sheriff
By Eddleigh Stadham D. S.

Sheriff claims 80 miles at
Ten Cents per mile Total $ 8.00
TAYLOR WILKINS, Sheriff
BY Stadham
DEPUTY SHERIFF

Loxley, Ala

JACK PONDER, d/b/a
Ponder Company,

PLAINTIFF

VS

L. D. TUBERVILLE AND
ALICE TUBERVILLE

DEFENDANTS

BILL OF COMPLAINT

FILED
JUL 10 1959
ALICE J. DUCK, CLERK REGISTER