

4478

STATE OF ALABAMA, EX REL.  
MACDONALD GALLION, AS ATTORNEY  
GENERAL OF THE STATE OF ALABAMA

VS.

BERTRAND GOLDBERG AND  
BERTRAND GOLDBERG, DOING BUSINESS  
AS BERTRAND GOLDBERG ASSOCIATES.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

PETITION

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA:

The State of Alabama, on the relation of MacDonald  
Gallion, as its Attorney General, gives the Court here to  
understand and be informed as follows, to-wit:

1. That your relator is the duly qualified and  
elected Attorney General of the State of Alabama, and has been  
and is now acting in said capacity in this proceeding.

2. Your relator gives the Court to further understand  
and be informed, and does aver that Bertrand Goldberg in said  
County of Baldwin within the three years last passed, has  
intruded and is intruding into the profession of architecture  
by engaging in the planning or designing for the erection, en-  
larging or alteration of a building or buildings for others,  
or by furnishing architectural supervision of the construction  
thereof (a profession requiring a license or certificate or  
other legal authorization within this State), without having ob-  
tained a certificate of registration from the State Board for  
the Registration of Architects of the State of Alabama, or the  
license required by law, and is still unlawfully practicing  
said profession in Baldwin County, Alabama.

3. Your relator gives the Court to further understand and be informed, and does aver that Bertrand Goldberg, doing business as Bertrand Goldberg Associates, in said County of Baldwin ~~within the~~ three years last passed, has intruded and is intruding into the profession of architecture by engaging in the planning or designing for the erection, enlarging or alteration of a building or buildings for others, or by furnishing architectural supervision of the construction thereof (a profession requiring a license or certificate or other legal authorization within this State), without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and is still unlawfully practicing said profession in Baldwin County, Alabama.

4. Your relator further avers that the defendant, ~~Bertrand Goldberg~~, is over the age of twenty-one years and is a non-resident of the State of Alabama, and that the present post office address of said defendant, Bertrand Goldberg, is "Bertrand Goldberg Associates, Architects and Engineers, 721 North Michigan Avenue, Chicago 11, Illinois."

WHEREFORE, THE PREMISES CONSIDERED, YOUR RELATOR PRAYS:

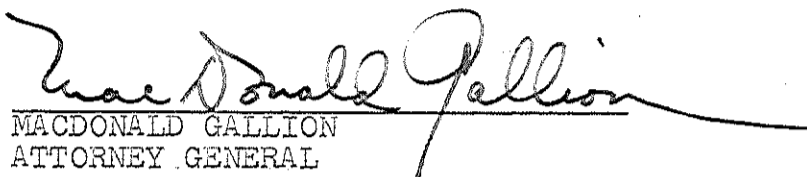
1. That process may issue as provided by law, requiring and commanding the said Bertrand Goldberg to show cause by what warrant or authority he is practicing said profession.

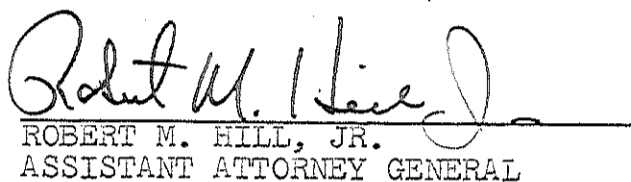
2. That the said Bertrand Goldberg be excluded from said profession and be prohibited from practicing the same in the State of Alabama, until he shall have complied with the law.

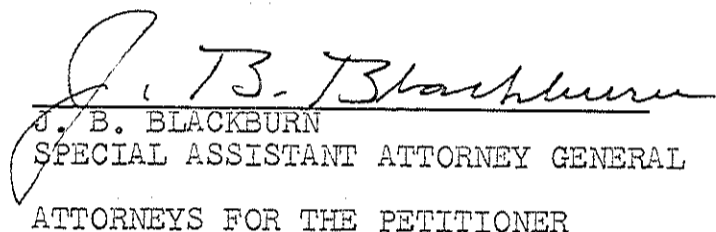
3. That all such other, further and different orders and processes be made and issued by the Court, as the statutes in such cases provide and that Your Honor will grant unto your relator such other, further and different relief as the nature of the case may require.

4. That service of process upon the defendant, Bertrand Goldberg, may be had in accordance with the provisions of Title 7, Sections 201, 202, Code of Alabama 1940.


Trial of this action by jury is demanded.

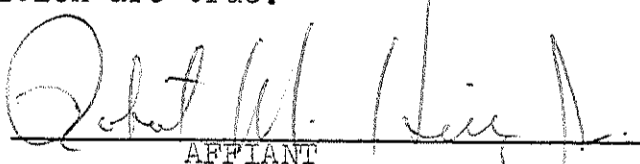
  
MACDONALD GALLION  
ATTORNEY GENERAL

  
ROBERT M. HILL, JR.  
ASSISTANT ATTORNEY GENERAL

  
J. B. BLACKBURN  
SPECIAL ASSISTANT ATTORNEY GENERAL  
ATTORNEYS FOR THE PETITIONER

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, , a Notary Public in and for said State and county, personally appeared Robert M. Hill, Jr., Assistant Attorney General of the State of Alabama, one of the attorneys for the petitioner, and who is known to me, and who being first duly sworn, deposes and says that the allegations of the foregoing petition are true.

  
AFFIANT

Sworn and subscribed before me on this the 18<sup>th</sup> day of October, 1960.

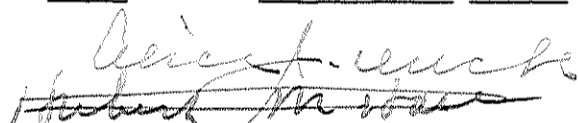
  
NOTARY PUBLIC, BALDWIN COUNTY  
State of Ala

WRIT OF QUO WARRANTO

TO BERTRAND GOLDBERG:

In obedience to an order of the Circuit Court of Baldwin County, Alabama, made by the Honorable Hubert M. Hall, Judge of the Circuit Court, on the petition of the State of Alabama on the relation of MacDonald Gallion, as its Attorney General, you are hereby commanded to be and appear before said Court at the courthouse in Bay Minette, Alabama, the 17th day of November, 1960, at 9:30 o'clock A.M., and show by what legal authority and warrant you are practicing or have practiced in Baldwin County, Alabama, for, to-wit: three years last passed, the profession of architecture without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and show cause, if any you have, why you should not be excluded from said profession and prohibited from practicing the same in the State of Alabama until you have complied with the law.

Witness my hand this the 3rd day of November, 1960.

  
CLERK, CIRCUIT COURT

STATE OF ALABAMA, EL REL. : IN THE CIRCUIT COURT  
MACDONALD GALLION, AS ATTORNEY :  
GENERAL OF THE STATE OF ALABAMA : OF BALDWIN COUNTY,  
VS. : ALABAMA  
BERTRAND GOLDBERG AND : AT LAW  
BERTRAND GOLDBERG, DOING BUSINESS :  
AS BERTRAND GOLDBERG ASSOCIATES :

DEMURRER

Comes now each of said defendants, Bertrand Goldberg and Bertrand Goldberg, doing business as Bertrand Goldberg Associates, separately, and demurs to the petition as a whole and to each count and paragraph thereof, separately and severally, and, for separate and several grounds of demurrer, sets down and assigns, separately and severally, the following:

1. For that it does not set forth facts sufficient to constitute a cause of action against this defendant.
2. For that it does not concisely and clearly set forth the act or omission complained of.
3. For that it is indefinite and uncertain.
4. For that it is vague, ambiguous and does not conform with the requirements of Title 7, Section 1144, 1940 Code of Alabama, as last amended.
5. For that the act or omission complained of does not appear with sufficient certainty.
6. For aught that appears, the time within which this action was brought has expired.
7. For aught that appears, said action is barred by the statute of limitations.

8. For aught that appears, said action has not been commenced within the time allowed by law.

9. For that it is duplicitous.

10. For that it attempts to set forth more than one cause of action.

11. For that the allegation that this defendant "is still unlawfully practicing said profession" constitutes merely the conclusion of the pleader, with insufficient facts being averred in support thereof.

12. For that it does not appear with sufficient certainty where the act or acts complained of occurred.

13. For that the allegation that this defendant "has intruded and is intruding into the profession of architecture" constitutes merely the conclusion of the pleader, with insufficient facts being alleged in support thereof.


14. For that each alternative averment does not set forth facts sufficient to constitute a cause of action against this defendant.

15. For aught that appears, the act complained of consisted of making plans and specifications for a building upon a farm for the use of a farmer.

16. For aught that appears, the act complained of consisted of making plans and specifications for a one or two family residence building costing less than Ten Thousand and No/100 (\$10,000.00) Dollars.

17. For aught that appears, the act complained of consisted of making plans and specifications for a domestic outbuilding appurtenant to a one or two family residence costing less than Ten Thousand and No/100 (\$10,000.00) Dollars.

18. For aught that appears, the act complained of consisted of making plans and specifications for a building costing less than Ten Thousand and No/100 (\$10,00.00) Dollars which was not a school, auditorium or any other building intended for the mass assemblage of people.

  
Paul W. Brock, Attorney for Each of  
Said Defendants.

Of Counsel:


HAND, ARENDALL, BEDSOLE,  
GREAVES & JOHNSTON

Each of said defendants respectfully demands the trial of  
this cause by jury.

FILED

NOV 22 1960

ALICE J. DUCK, CLERK  
REGISTER

  
Paul W. Brock, Attorney for Each of  
Said Defendants.

STATE OF ALABAMA, EX REL.  
MACDONALD GALLION, AS ATTORNEY  
GENERAL OF THE STATE OF ALABAMA

VS.

BERTRAND GOLDBERG AND  
BERTRAND GOLDBERG, DOING BUSINESS  
AS BERTRAND GOLDBERG ASSOCIATES

) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY, ALABAMA  
)

) AT LAW  
)  
)

A N S W E R

Comes now each of the defendants in the above case,  
Bertrand Goldberg and Bertrand Goldberg, doing business as  
Bertrand Goldberg Associates, and, for answer to the petition  
and to each count and paragraph thereof, separately, does  
allege the following:

1) Said defendant is over the age of twenty-one (21)  
years and is a non-resident of the State of Alabama. The  
defendant admits that the relator is Attorney General for the  
State of Alabama.

2) For further answer to the petition, the defendant  
alleges that he is and was, at all times mentioned in said  
petition, a duly licensed and registered architect and engineer  
in the State of Illinois; that he is and has been in independent  
practice as such architect and engineer for more than ten (10)  
years in said state, and has in his employment, a large number  
of well trained, experienced, and qualified engineers, archi-  
tects and other persons; that he was retained to perform certain  
work in Baldwin County, Alabama, and that, in the furtherance  
of such employment, and in cooperation with several engineering  
firms, he prepared a number of plans and drawings. These firms

were James N. Garrett and Associates of Mobile, Alabama; Eustis Engineering Company of New Orleans, Louisiana; and National Pool Engineers, Inc. of Florence, Alabama. Several of these firms have now and did have associated with them professional engineers, registered in the State of Alabama, and all of said plans as to which it was proper or advisable were examined, approved, and sealed by Mr. Maurice W. Bryant, who is Registered Engineer Number 2774 of the State of Alabama.

3) Defendant further alleges that no building or buildings, as defined by the statutes of the State of Alabama, have been constructed in Baldwin County, Alabama, pursuant to any plans or designs prepared by the defendant. Accordingly, defendant denies that he has intruded or is intruding into the profession of architecture in the State of Alabama, and further alleges that if he has failed to comply with any laws of said state pertaining to the practice of architecture, such failure was the result of mere inadvertence on his part and that he acted at all times in the belief that his actions were proper and correct in every respect.

4) Nonetheless, defendant has, through his attorney-at-law, conferred with the Office of the Attorney General of the State of Alabama and also with the Board for Registration of Architects, and defendant's attorney has advised that defendant may have technically failed to comply with some provision of the statutes of the State of Alabama pertinent to this proceeding. Accordingly, defendant has made arrangements to present his qualifications to

the State Board for Registration of Architects and to apply for registration before that Board, which registration will make this pending proceeding moot. Therefore, in order to prevent the additional and needless expense which would otherwise be incurred in the defense of this action, defendant withdraws his demand for a jury trial herein and consents to the entry of a judgment in favor of the State of Alabama by the court in the above case.

*Paul W. Brock*

Paul W. Brock, Attorney for each  
of said defendants

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

JAN 27 1961

ALICE J. DUCK, CLERK  
REGISTER

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

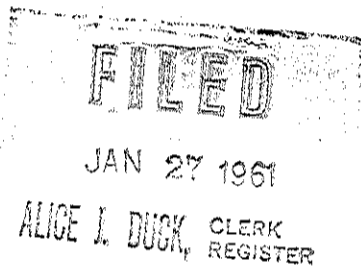
This cause this day coming on to be heard and considered by the court, came the State of Alabama by the relator, MacDonald Gallion, by and through J. B. Blackburn, Special Assistant Attorney General, and also came each of the respondents, Bertrand Goldberg and Bertrand Goldberg, doing business as Bertrand Goldberg Associates, by his attorney of record, Paul W. Brock, and each of said respondents having filed his answer to the writ in the nature of a Quo Warranto and having withdrawn his demand for a jury trial herein, the court now proceeds to hear and consider said matter.

Each of said respondents having consented in open court for the court to grant the relief prayed for in the original petition on file herein, upon consideration thereof, it is ordered and adjudged by the court that said relief be granted.

NOW THEREFORE, it is hereby considered, ordered and adjudged by the court that the said Bertrand Goldberg and Bertrand Goldberg, doing business as Bertrand Goldberg Associates, be, and they each hereby are, excluded and prohibited from illegally practicing the profession of architecture in the State of Alabama, and that the

petitioner, the State of Alabama, have and recover of said Bertrand Goldberg and Bertrand Goldberg, doing business as Bertrand Goldberg Associates, the costs in this behalf expended, for which execution may issue.

Dated this 27<sup>th</sup> day of January, 1961.



Hubert M. Stan  
Judge, Circuit Court of Baldwin County,  
Alabama

STATE OF ALABAMA, EX REL.  
MACDONALD GALLION, AS ATTORNEY  
GENERAL OF THE STATE OF ALABAMA

VS.

BERTRAND GOLDBERG AND BERTRAND  
GOLDBERG, DOING BUSINESS AS  
BERTRAND GOLDBERG ASSOCIATES

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

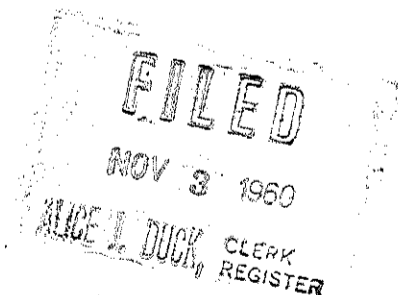
ORDER DIRECTING SERVICE

It appearing to the Court from the affidavit of the Petitioner that the defendant, Bertrand Goldberg, is a non-resident of the State of Alabama, now residing at "Bertrand Goldberg Associates, Architects and Engineers, 721 North Michigan Avenue, Chicago 11, Illinois," and that said defendant is over the age of twenty-one years; it is therefore,

CONSIDERED, ORDERED AND ADJUDGED by the Court that service upon the said defendant be had by the Clerk sending through registered mail, postage prepaid, to the said defendant, at the above-named address, a duly certified copy of said petition, marking on the envelope "For Delivery Only to the Person to Whom Addressed," and that the Clerk demand of the postal authority a return receipt to be addressed to the said Clerk of the Court.

Dated this the 3 day of Nov., 1960.

*Hubert M. Hall*  
\_\_\_\_\_  
HUBERT M. HALL  
CIRCUIT JUDGE

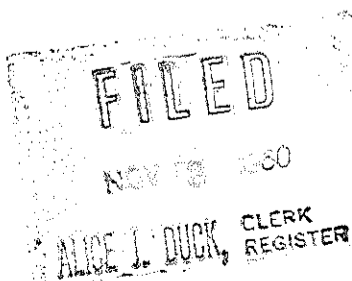


700 4478

ORDER OF THE COURT ON PETITION

This day came the State of Alabama on the relation of MacDonald Gallion, as its Attorney General, and filed herein its petition against Bertrand Goldberg, alleging that the said Bertrand Goldbert intruded into or unlawfully exercised the profession of architecture, in that he engaged in the planning and designing for the erection, enlarging or alteration of a building or buildings for others, or furnished architectural supervision of the construction thereof without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and is still unlawfully practicing said profession in Baldwin County, Alabama, said petition praying that process may issue requiring and commanding the said Bertrand Goldberg to show by what authority he is practicing the said profession in Baldwin County, Alabama, without having obtained the license or certificate required by law; and upon consideration of the said petition, it is, ordered by the Court that a copy of said petition be forthwith served upon Bertrand Goldberg and that he, the said Bertrand Goldberg, be and he is hereby commanded to appear before the Circuit Court of Baldwin County, Alabama, on the 17th day of November, 1960, at the Courthouse in Bay Minette, Alabama, at 9:30 A.M. o'clock, to show by what authority he has unlawfully intruded into the profession of architecture without having obtained a license or certificate of registration as prescribed and required by law in the State of Alabama, and is still unlawfully practicing said profession in the State of Alabama, without having obtained the license or certificate required by law.

Dated at Bay Minette, Alabama, this the 3rd day of November, 1960.



HUBERT M. HALL, JUDGE,  
TWENTY-EIGHTH JUDICIAL CIRCUIT  
OF ALABAMA

ORDER OF THE COURT ON PETITION

This day came the State of Alabama on the relation of MacDonald Gallion, as its Attorney General, and filed herein its petition against Bertrand Goldberg, alleging that the said Bertrand Goldbert intruded into or unlawfully exercised the profession of architecture, in that he engaged in the planning and designing for the erection, enlarging or alteration of a building or buildings for others, or furnished architectural supervision of the construction thereof without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and is still unlawfully practicing said profession in Baldwin County, Alabama, said petition praying that process may issue requiring and commanding the said Bertrand Goldberg to show by what authority he is practicing the said profession in Baldwin County, Alabama, without having obtained the license or certificate required by law; and upon consideration of the said petition, it is, ordered by the Court that a copy of said petition be forthwith served upon Bertrand Goldberg and that he, the said Bertrand Goldberg, be and he is hereby commanded to appear before the Circuit Court of Baldwin County, Alabama, on the 17th day of November, 1960, at the Courthouse in Bay Minette, Alabama, at 9:30 A.M. o'clock, to show by what authority he has unlawfully intruded into the profession of architecture without having obtained a license or certificate of registration as prescribed and required by law in the State of Alabama, and is still unlawfully practicing said profession in the State of Alabama, without having obtained the license or certificate required by law.

Dated at Bay Minette, Alabama, this the 3rd day of November, 1960.

FILED

NOV 8 1960

ALICE J. DUCK, CLERK  
REGISTER

*Hubert M. Hall*  
HUBERT M. HALL, JUDGE,  
TWENTY-EIGHTH JUDICIAL CIRCUIT  
OF ALABAMA

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

SUITE 622 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON, JR.  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
W. C. BOONE, JR.  
DONALD F. PIERCE

MAILING ADDRESS:  
P. O. BOX 123

CABLE ADDRESS:  
HAB

TELEPHONE:  
HEMLOCK 2-5514

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

Re: State of Alabama, ex rel. MacDonald Gallion,  
as Attorney General of the State of Alabama  
v. Bertrand Goldberg and Bertrand Goldberg  
doing business as Bertrand Goldberg Associates.

Dear Miss Duck:

Enclosed are the demurrers filed by each of the defendants in the above cause, as well as my receipt for the filing of this initial pleading. If you would mail back to me the receipt for my file, I would appreciate it. Also, please let me know when these demurrers will be set for argument.

With best regards,

Yours very truly,



For the Firm

PWB.ba

Enclosures

cc: J. B. Blackburn, Esq.  
Attorney at Law  
Bay Minette, Alabama

SUMMONS

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bertrand Goldberg to appear before the Circuit Court of Baldwin County, Alabama, at 9:30 o'clock A.M. on the 17th day of November, 1960, or within five (5) days from the service of this summons of complaint or petition, then and there to demur or plead to the complaint or petition of the State of Alabama on the relation of MacDonald Gallion, its Attorney General.

A copy of said complaint or petition is attached hereto and made a part hereof.

You are hereby commanded to execute this process instantler and make return thereof as required by law.

Witness my hand this 3rd day of November, 1960.

  
CLERK, CIRCUIT COURT OF  
BALDWIN COUNTY

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ALICE J. DUCK, CLERK  
REGISTER

STATE OF ALABAMA, EX REL.  
MACDONALD GALLION, AS ATTORNEY  
GENERAL OF THE STATE OF ALABAMA

VS.

BERTRAND GOLDBERG AND  
BERTRAND GOLDBERG, DOING BUSINESS  
AS BERTRAND GOLDBERG ASSOCIATES.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

PETITION

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA:

The State of Alabama, on the relation of MacDonald Gallion, as its Attorney General, gives the Court here to understand and be informed as follows, to-wit:

1. That your relator is the duly qualified and elected Attorney General of the State of Alabama, and has been and is now acting in said capacity in this proceeding.

2. Your relator gives the Court to further understand and be informed, and does aver that Bertrand Goldberg in said County of Baldwin within the three years last passed, has intruded and is intruding into the profession of architecture by engaging in the planning or designing for the erection, enlarging or alteration of a building or buildings for others, or by furnishing architectural supervision of the construction thereof (a profession requiring a license or certificate or other legal authorization within this State), without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and is still unlawfully practicing said profession in Baldwin County, Alabama.

3. Your relator gives the Court to further understand and be informed, and does aver that Bertrand Goldberg, doing business as Bertrand Goldberg Associates, in said County of Baldwin within the three years last passed, has intruded and is intruding into the profession of architecture by engaging in the planning or designing for the erection, enlarging or alteration of a building or buildings for others, or by furnishing architectural supervision of the construction thereof (a profession requiring a license or certificate or other legal authorization within this State), without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and is still unlawfully practicing said profession in Baldwin County, Alabama.

4. Your relator further avers that the defendant, Bertrand Goldberg, is over the age of twenty-one years and is a non-resident of the State of Alabama, and that the present post office address of said defendant, Bertrand Goldberg, is Bertrand Goldberg Associates, Architects and Engineers, 721 North Michigan Avenue, Chicago 11, Illinois."

WHEREFORE, THE PREMISES CONSIDERED, YOUR RELATOR PRAYS:

1. That process may issue as provided by law, requiring and commanding the said Bertrand Goldberg to show cause by what warrant or authority he is practicing said profession.

2. That the said Bertrand Goldberg be excluded from said profession and be prohibited from practicing the same in the State of Alabama, until he shall have complied with the law.

3. That all such other, further and different orders and processes be made and issued by the Court, as the statutes in such cases provide and that Your Honor will grant unto your relator such other, further and different relief as the nature of the case may require.

4. That service of process upon the defendant, Bertrand Goldberg, may be had in accordance with the provisions of Title 7, Sections 201, 202, Code of Alabama 1940.

Trial of this action by jury is demanded.

*Mac Donald Gallion*  
MACDONALD GALLION  
ATTORNEY GENERAL

*Robert M. Hill, Jr.*  
ROBERT M. HILL, JR.  
ASSISTANT ATTORNEY GENERAL

*J. B. Blackburn*  
J. B. BLACKBURN  
SPECIAL ASSISTANT ATTORNEY GENERAL

ATTORNEYS FOR THE PETITIONER

STATE OF ALABAMA

BALDWIN COUNTY

Before me, *Joseph D. Phelps*, a Notary Public in and for said State and county, personally appeared Robert M. Hill, Jr., Assistant Attorney General of the State of Alabama, one of the attorneys for the petitioner, and who is known to me, and who being first duly sworn, deposes and says that the allegations of the foregoing petition are true.

*Robert M. Hill, Jr.*  
AFFIANT

Sworn and subscribed before me on this the 11 day of

October, 1960.

*Joseph D. Phelps*  
NOTARY PUBLIC, BALDWIN COUNTY

*Street Page*

STATE OF ALABAMA, EX REL.  
MACDONALD GALLION, AS ATTORNEY  
GENERAL OF THE STATE OF ALABAMA

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS.

BERTRAND GOLDBERG AND BERTRAND  
GOLDBERG, DOING BUSINESS AS  
BERTRAND GOLDBERG ASSOCIATES

ORDER DIRECTING SERVICE

It appearing to the Court from the affidavit of the  
Petitioner that the defendant, Bertrand Goldberg, is a non-  
resident of the State of Alabama, now residing at "Bertrand  
Goldberg Associates, Architects and Engineers, 721 North  
Michigan Avenue, Chicago 11, Illinois," and that said defendant  
is over the age of twenty-one years; it is therefore,

CONSIDERED, ORDERED AND ADJUDGED by the Court that  
service upon the said defendant be had by the Clerk sending  
through registered mail, postage prepaid, to the said defendant,  
at the above-named address, a duly certified copy of said  
petition, marking on the envelope "For Delivery Only to the  
Person to Whom Addressed," and that the Clerk demand of the  
postal authority a return receipt to be addressed to the said  
Clerk of the Court.

Dated this the 3 day of Nov, 1960.

*Hubert M. Hall*  
\_\_\_\_\_  
HUBERT M. HALL  
CIRCUIT JUDGE

WRIT OF QUO WARRANTO

TO BERTRAND GOLDBERG:

In obedience to an order of the Circuit Court of Baldwin County, Alabama, made by the Honorable Hubert M. Hall, Judge of the Circuit Court, on the petition of the State of Alabama on the relation of MacDonald Gallion, as its Attorney General, you are hereby commanded to be and appear before said Court at the courthouse in Bay Minette, Alabama, the 17th day of November, 1960, at 9:30 o'clock A.M., and show by what legal authority and warrant you are practicing or have practiced in Baldwin County, Alabama, for, to-wit: three years last passed, the profession of architecture without having obtained a certificate of registration from the State Board for the Registration of Architects of the State of Alabama, or the license required by law, and show cause, if any you have, why you should not be excluded from said profession and prohibited from practicing the same in the State of Alabama until you have complied with the law.

Witness my hand this the 3rd day of November, 1960.

FILED

NOV 3 1960

ALICE I. DUCK, CLERK  
REGISTER

Albert I. Duck  
CLERK, CIRCUIT COURT

SUMMONS

TO ANY SHERIFF OF THE STATE OF ALABAMA:

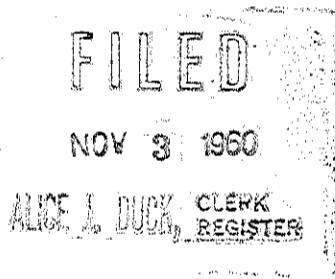
You are hereby commanded to summon Bertrand Goldberg to appear before the Circuit Court of Baldwin County, Alabama, at 9:30 o'clock A.M. on the 17th day of November, 1960, or within five (5) days from the service of this summons of complaint or petition, then and there to demur or plead to the complaint or petition of the State of Alabama on the relation of MacDonald Gallion, its Attorney General.

A copy of said complaint or petition is attached hereto and made a part hereof.

You are hereby commanded to execute this process instantter and make return thereof as required by law.

Witness my hand this 3rd day of November, 1960.

Alice J. Duck  
CLERK, CIRCUIT COURT OF  
BALDWIN COUNTY



11-8-69

DATE DELIVERED

ADDRESS WHERE DELIVERED (only if required by item #11)

SIGNATURE OF ADDRESSEE (if any)

SIGNATURE OF NAME OF ADDRESSEE (if any)

It is requested that the number of copies delivered be noted on this side

RETURN RECEIPT

(Additional address required for these services)

DELIVER ONLY TO ☐ DELIVERED ☐

INSTRUCTIONS TO DELIVERING EMPLOYEE

RECEIVED NO. 100-100000		REGISTERED NO. 100-100000	
CITY, ZONE AND STATE Bay Mills, Mich.		STREET AND P.O. BOX P.O. Box 239	
NAME OF SENDER ALICE M. DICK		NAME OF ADDRESSEE ALICE M. DICK	
POSTAGE PAID 100-100000		NO. OF COPIES 100-100000	
POST OFFICE DEPARTMENT 100-100000		9/4/78	