

SMITH-KELLY SUPPLY COMPANY,	:	
INC., a corporation,	:	
Plaintiff,	:	IN THE CIRCUIT COURT OF
	:	BALDWIN COUNTY, ALABAMA
VS:	:	
	:	AT LAW
THE PINEDA CLUB, INC.,	:	
a corporation,	:	NO. 4558
Defendant	:	

Upon the annexed petition of Robert L. Byrd, Jr., as Trustee of The Pineda Club, Inc., a bankrupt, praying for the stay of the captioned lawsuit, and it appearing that such suit or proceedings were pending at the time of the filing of the petition and that the suit or proceedings are founded upon claims from which a discharge in bankruptcy would be a release and that no notice of this application should be given and no adverse interest being represented, it is hereby

ORDERED that the captioned lawsuit be stayed and that the proceedings be restrained and enjoined until final decree in the bankruptcy proceedings or further order of this court.

FILED

JUN 8

ALICE J. DUCK, CLERK  
REGISTRAR

Robert M. Byrd  
Judge

SMITH-KELLY SUPPLY	:	
COMPANY, INC.,	:	
a corporation,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
VS:	:	AT LAW
THE PINEDA CLUB, INC.,	:	NO. _____
a corporation,	:	
Defendant	:	

Comes now your Petitioner, Robert L. Byrd, Jr., who is the duly elected and qualified Trustee of The Pineda Club, Inc., a bankrupt estate, and respectfully represents and shows unto this honorable court as follows:

### I

On the 24th day of April, 1961, The Pineda Club, Inc., a corporation, filed a voluntary petition in the District Court of the United States for the Southern District of Alabama, Southern Division, seeking to declare The Pineda Club, Inc., a bankrupt; and on the same date it was duly adjudged a bankrupt and the proceedings were referred to the Honorable Sidney J. Gray, Referee in Bankruptcy.


### II

On the 8th day of May, 1961, your Petitioner was appointed as Trustee of The Pineda Club, Inc., a corporation, and your Petitioner has now been duly qualified and has entered upon the performance of his official duties as Trustee of the said named bankrupt estate.

### III

It has come to the attention of your Petitioner that at the time of filing the bankruptcy petition and the appointment of your Petitioner as Trustee and at the present time, the captioned lawsuit was and still is pending before this honorable court; that said suit is founded upon a claim which a discharge in bankruptcy would be a release.

WHEREFORE, your Petitioner moves and prays that the captioned lawsuit be stayed and that the Plaintiff therein be enjoined and restrained until final decree in the bankruptcy proceedings from doing any act or commencing any other proceedings in stated cause until a final decree or order therein, and that he have such other and further relief as is just in the premises.

  
Ronald P. Slepian, Attorney for  
Robert L. Byrd, Jr., as Trustee  
in Bankruptcy of The Pineda Club,  
Inc., a bankrupt estate.

SMITH-KELLY SUPPLY COMPANY, INC.,  
A corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a Corporation, WILLIAM  
LANGHORN CONSTRUCTION COMPANY,  
INC., and UNITED STATES LAND  
DEVELOPMENT COMPANY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

DEMURRERS:

Comes now the Defendant, U. S. LAND DEVELOPMENT CORPORATION.,  
and demurs to the Bill of Complaint filed in the above styled cause  
and for grounds thereof says:

ONE: From aught that appears the Bill of Complaint does not  
state the true name of U. S. LAND DEVELOPMENT CORPORATION..

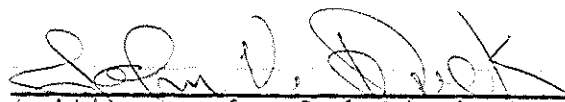
TWO: From aught that appears, the Plaintiff is combining two  
code counts under one count under the Bill of Complaint.

THREE: Said Bill of Complaint does not allege that the lien  
was recorded within the statutory period.

FILED

FEB 22 1961

ALICE J. DUCK, CLERK  
REGISTER

  
Attorney for Defendant  
U.S. LAND DEVELOPMENT CORP.

SMITH-KELLY SUPPLY COMPANY,  
INC., a corporation

Plaintiff

vs

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
LANGHORN CONSTRUCTION CO.  
INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CIVIL DIVISION  
CASE NO. \_\_\_\_\_

Comes the defendant, The Pineda Club, Inc., in the above  
styled cause and for demurrer to said complaint filed in said cause  
and to each phase thereof separately and severally shows unto this  
Honorable Court as follows:

-1-

That said complaint fails to allege notice to the Pineda  
Club, Inc., in accordance with requirements of the Code of Alabama  
of 1940 for delivery of materials as a sub-contractor.

-2-

That said complaint fails to allege a legal description  
as required under the Code of Alabama of 1940 for a materialman's  
lien or mechanic's lien on real property.

-3-

That said complaint fails to allege whether the alleged  
contract is an oral contract or a contract in writing.

THOMPSON & WHITE

BY: 

Attorneys for the Pineda Club, Inc.

Defendant requests trial by jury.



FILED

JAN 23 1961

ALICE J. DUCK, CLERK  
REGISTER

SMITH-KELLY SUPPLY	:	
COMPANY, INC.,	:	
a corporation,	:	IN THE CIRCUIT COURT OF
	:	
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
	:	
VS:	:	AT LAW
	:	
THE PINEDA CLUB, INC.,	:	NO. _____
a corporation,	:	
	:	
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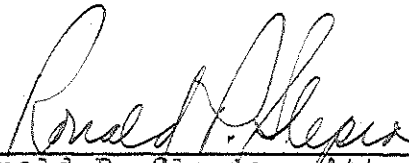
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Ronald P. Slepian, Attorney for  
Robert L. Byrd, Jr., as Trustee  
in Bankruptcy of The Pineda Club,  
Inc., a bankrupt estate.

*[Faint handwritten notes on the left margin: "C. 100", "100", "100", "100"]*

*[Vertical stamp on the right: "FILED", "MAR 29 1961", "U.S. DISTRICT COURT", "SOUTHERN DISTRICT OF NEW YORK"]*

SMITH-KELLY SUPPLY COMPANY,  
INC., a corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
LANGHORN CONSTRUCTION COMPANY,  
INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA

I

I

I

I

CIVIL DIVISION

I CASE NO. \_\_\_\_\_

The Plaintiff claims of the Defendants ONE THOUSAND  
TWO HUNDRED SEVENTY-ONE AND 31/100 (\$1,271.31) DOLLARS  
with the interest thereon due from them by accounts dated  
on, to-wit, August 19, 1960, for materials furnished by the  
Plaintiff to the Defendants at their request on, to-wit,  
August 10, 1960, which sum of money with the interest thereon  
is still due and unpaid.

This suit is filed to perfect a lien recorded in  
\_\_\_\_\_ Book No. 5, Item No. 461, in the Probate Court  
of Baldwin County, Alabama, on the following described real  
property:

County of Baldwin, State of Alabama, described  
as follows, to-wit: From a point on the West  
end of the North Lane Bridge across Blakeley  
River, and on the center line of the North Lane  
of U.S. Highway No. 90, run North 10 degrees,  
56 minutes East a distance of 108.00 feet to the  
North right of way line of U. S. Highway No. 90  
for the point of beginning of the property herein  
described; thence North 79 degrees, 04 minutes  
West along the said North right of way line a  
distance of 1110.53 feet to a point; thence North-  
wardly 70 feet to a point; thence West a distance  
of 51 feet to the East right of way line of Blakeley  
Boulevard, thence North 10 degrees, 56 minutes East  
a distance of 90 feet to a point of curvature of  
a 407.89 foot radius curve to the right (which  
curve has a central angle of 21 degrees, 57 minutes,  
40 seconds); thence Northeastwardly along the arc of  
said curve a distance of 156.34 feet to a point of  
reverse curve of a 487.89 foot radius curve to the  
left (which curve has a central angle of 21 degrees,  
57 minutes, 40 seconds); thence Northeastwardly along  
the arc of said curve a distance of 187.01 feet to




the point of tangency; thence North 10 degrees, 56 minutes East a distance of 30 feet to a point of curvature of a 25 foot radius curve to the right (which curve has a central angle of 90 degrees, 00 minutes); thence Northeastwardly along the arc of said curve a distance of 39.27 feet to a point of tangency on the South right of way line of Caribbean Boulevard; thence South 79 degrees 04 minutes East along the South right of way line of Caribbean Boulevard and the projection thereof a distance of 867.90 feet to a point on the West bank of Blakeley River; thence South-eastwardly along the meanders of the said West bank a distance of 598 feet more or less to a point on the North right of way line of U.S. Highway No. 90, said point bears South 79 degrees, 04 minutes East a distance of 30.70 feet from the point of beginning; thence North 79 degrees, 04 minutes West a distance of 30.70 feet to the point of beginning of the above described property.

(a) The Grantor reserved unto itself, its successors or assigns, the fee simple title to the following described real property in Baldwin County, Alabama, as follows:

Commence at a point on the West end of North Lane Bridge on the centerline of U.S. Highway #90; THENCE N 10 degrees 56 minutes 00 seconds E, 108.00 feet to a point on the North right-of-way line of U. S. Highway #90 for a POINT OF BEGINNING; THENCE N 79 degrees 04 minutes 00 seconds W, for a distance of 209.30 feet; THENCE N 10 degrees 56 minutes 00 seconds E, 200 feet; THENCE S 79 degrees 04 minutes 00 seconds E, for a distance of 158.30 feet to a point on the West bank of Blakeley River, THENCE S 11 degrees 17 minutes 09 seconds E, for a distance of 216.04 feet to a point on the said North right-of-way line; THENCE N 79 degrees 04 minutes 00 seconds W, for a distance of 30.70 feet to the POINT OF BEGINNING.

And the Plaintiff claims jointly and severally to the above described real property and the improvements thereon owned by the Defendants in Baldwin County, Alabama.

  
LEON DUKE

United States Land Development Company may be served at Star Route 1, Daphne, Alabama.

Langhorn Construction Company, Inc., may be served by the Secretary of State who has been appointed duly authorized agent.

FILED

JAN 16 1961

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4558

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon The Pineda Club, INa. a Corp. William Langhorn  
Construction Co. Inc. & United States Land  
Development Company

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 The Pineda Club, Inc. a Corp.

William Langhorn Construction Co. & United States Land Development Co., Defendant .....

by SMITH-KELLY SUPPLY COMPANY, Inc. aCorp.

Plaintiff.....

Witness my hand this 16th day of January 1961.....

Archie J. Smith, Clerk

No. 4558

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

SMITH-KELLY SUPPLY CO., INC. A CORP.

Plaintiffs

vs.

THE PINEDA CLUB, INC. A CORP.  
WILLIAM LANGHORN CONSTRUCTION CO.  
INC. & UNITED STATES LAND  
DEVELOPMENT COMPANY

Defendants

SUMMONS and COMPLAINT

Filed 19

FILED

JAN 10 1961

ALICE J. DUCK, CLERK  
REGISTER

Clerk

LEON DUKE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

1/16, 1961

Sheriff

I have executed this summons

this 1/17, 1961

by leaving a copy with

Property Club, Inc.  
on Stanley Avenue 1/17/61  
Dickey Roper 1-27-61  
P.O. U.S. Land Development  
Co

Sheriff claims 130

Ten Cents per mile Total \$ 13.20

TAYLOR WILKINS, Sheriff

BY Wm. Garner Deputy Sheriff

Taylor Wilkins Sheriff

Wm. Garner Deputy Sheriff

I hope

SMITH-KELLY SUPPLY COMPANY,  
INC., a corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
LANGHORN CONSTRUCTION COMPANY,  
INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA

X

X

X

X

CIVIL DIVISION

X CASE NO. 4538

The Plaintiff claims of the Defendants ONE THOUSAND  
TWO HUNDRED SEVENTY-ONE AND 31/100 (\$1,271.31) DOLLARS  
with the interest thereon due from them by accounts dated  
on, to-wit, August 19, 1960, for materials furnished by the  
Plaintiff to the Defendants at their request on, to-wit,  
August 10, 1960, which sum of money with the interest thereon  
is still due and unpaid.

This suit is filed to perfect a lien recorded in  
Book No. 5, Item No. 461, in the Probate Court  
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as follows, to-wit: From a point on the West  
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56 minutes East a distance of 108.00 feet to the  
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the arc of said curve a distance of 187.01 feet to

the point of tangency; thence North 10 degrees, 56 minutes East a distance of 30 feet to a point of curvature of a 25 foot radius curve to the right (which curve has a central angle of 90 degrees, 00 minutes); thence Northeastwardly along the arc of said curve a distance of 39.27 feet to a point of tangency on the South right of way line of Caribbean Boulevard; thence South 79 degrees 04 minutes East along the South right of way line of Caribbean Boulevard and the projection thereof a distance of 867.90 feet to a point on the West bank fo Blakeley River; thence South-eastwardly along the meanders of the said West bank a distance of 598 feet more or less to a point on the North right of way line of U.S. Highway No. 90, said point bears South 79 degrees, 04 minutes East a distance of 30.70 feet from the point of beginning; thence North 79 degrees, 04 minutes West a distance of 30.70 feet to the point of beginning of the above described property.

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And the Plaintiff claims jointly and severally to the above described real property and the improvements thereon owned by the Defendants in Baldwin County, Alabama.

  
LEON DUKE

United States Land Development Company may be served at Star Route 1, Daphne, Alabama.

Langhorn Construction Company, Inc., may be served by the Secretary of State who has been appointed duly authorized agent.

FILED

JAN 18 1961

ALICE I. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4558

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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United States Land Development Company

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William Langhorn Construction Co., Inc. & United States Development Co., Defendant .....

by SMITH-KELLY SUPPLY COMPANY, INC. A CORP.

Plaintiff.....

Witness my hand this 16th day of January 19 61

Alvin J. [Signature], Clerk

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

SMITH-KELLY SUPPLY COMPANY, INC.

A Corporation

Plaintiffs

vs.

THE PINEDA CLUB, INC. A Corp.  
WILLIAM LANGHORN CONSTRUCTION CO.  
INC. & UNITED STATES LAND  
DEVELOPMENT COMPANY

Defendants

SUMMONS and COMPLAINT

Filed , 19

FILED

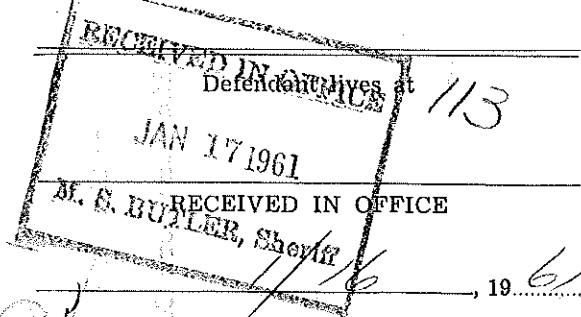
JAN 16 1961

ALICE J. DUCK, CLERK  
REGISTER

LEON DUKE

Plaintiff's Attorney

Defendant's Attorney



I have executed this summons

this , 19

by leaving a copy with

Sheriff

Deputy Sheriff



BETTYE FRINK  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY 4, ALABAMA

January 18, 1961

M E M O R A N D U M

TO: Sheriff of Montgomery County, Montgomery, Alabama

FROM: Secretary of State

SUBJECT: Process of Service

Smith-Kelly Supply Company, Inc., a corporation VS  
Langhorn Construction Company, Inc., et al

Please decide which section of the 1940 Code of Alabama, Recompiled Edition of 1958, is applicable in the above-styled case. The requirements for your affidavit or affidavits are set out in the Code. As soon as I receive the required information, I will be happy to serve same.

*Bettye Frink*



SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 552

TERM, 19

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William Langhorn Construction Co., Inc. & United States Development Co., Defendant

by SMITH-KELLY SUPPLY COMPANY, INC. A CORP.

, Plaintiff

Witness my hand this 16th day of January 1962

Alice J. Smith, Clerk

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

**SMITH-KELLY SUPPLY COMPANY, INC.**

**A Corporation**

Plaintiffs

vs.

**THE PINEDA CLUB, INC. A Corp.**  
**WILLIAM LANGHORN CONSTRUCTION CO.**  
**INC. & UNITED STATES LAND**  
**DEVELOPMENT COMPANY**

Defendants

**SUMMONS and COMPLAINT**

Filed **FILED** ....., 19.....

**JAN 18 1961**

**ALICE J. DUCK, CLERK**  
**REGISTER**

....., Clerk

**LEON DUKE**

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

SMITH-KELLY SUPPLY COMPANY,  
INC., a corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
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INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

X

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CIVIL DIVISION

X CASE NO. \_\_\_\_\_

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FILED

JAN 16 1961

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No 4558.....

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by SMITH-KELLY SUPPLY COMPANY, INC. A CORP.  
....., Plaintiff.....

Witness my hand this 16th day of JANUARY 1961.....

Alvin J. Hark Clerk

No. 9338

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

SMITH-KELLY SUPPLY COMPANY, INC.

A Corporation

Plaintiffs

vs.

THE PINEDA CLUB, INC. A Corp.  
WILLIAM LANGHORN CONSTRUCTION CO.  
INC. & UNITED STATES LAND  
DEVELOPMENT COMPANY

Defendants

SUMMONS and COMPLAINT

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JAN 16 1961

ALICE J. DUCK, CLERK  
REGISTER

Clerk

LEON DUKE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

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Sheriff

Deputy Sheriff

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INC., a corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
LANGHORN CONSTRUCTION COMPANY,  
INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA

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X CASE NO. \_\_\_\_\_

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with the interest thereon due from them by accounts dated  
on, to-wit, August 19, 1960, for materials furnished by the  
Plaintiff to the Defendants at their request on, to-wit,  
August 10, 1960, which sum of money with the interest thereon  
is still due and unpaid.

This suit is filed to perfect a lien recorded in  
\_\_\_\_\_ Book No. 5, Item No. 461, in the Probate Court  
of Baldwin County, Alabama, on the following described real  
property:


County of Baldwin, State of Alabama, described  
as follows, to-wit: From a point on the West  
end of the North Lane Bridge across Blakeley  
River, and on the center line of the North Lane  
of U.S. Highway No. 90, run North 10 degrees,  
56 minutes East a distance of 108.00 feet to the  
North right of way line of U. S. Highway No. 90  
for the point of beginning of the property herein  
described; thence North 79 degrees, 04 minutes  
West along the said North right of way line a  
distance of 1110.53 feet to a point; thence North-  
wardly 70 feet to a point; thence West a distance  
of 51 feet to the East right of way line of Blakeley  
Boulevard, thence North 10 degrees, 56 minutes East  
a distance of 90 feet to a point of curvature of  
a 407.89 foot radius curve to the right (which  
curve has a central angle of 21 degrees, 57 minutes,  
40 seconds); thence Northeastwardly along the arc of  
said curve a distance of 156.34 feet to a point of  
reverse curve of a 487.89 foot radius curve to the  
left (which curve has a central angle of 21 degrees,  
57 minutes, 40 seconds); thence Northeastwardly along  
the arc of said curve a distance of 187.01 feet to

the point of tangency; thence North 10 degrees, 56 minutes East a distance of 30 feet to a point of curvature of a 25 foot radius curve to the right (which curve has a central angle of 90 degrees, 00 minutes); thence Northeastwardly along the arc of said curve a distance of 39.27 feet to a point of tangency on the South right of way line of Caribbean Boulevard; thence South 79 degrees 04 minutes East along the South right of way line of Caribbean Boulevard and the projection thereof a distance of 867.90 feet to a point on the West bank of Blakeley River; thence Southeastwardly along the meanders of the said West bank a distance of 598 feet more or less to a point on the North right of way line of U.S. Highway No. 90, said point bears South 79 degrees, 04 minutes East a distance of 30.70 feet from the point of beginning; thence North 79 degrees, 04 minutes West a distance of 30.70 feet to the point of beginning of the above described property.

(a) The Grantor reserved unto itself, its successors or assigns, the fee simple title to the following described real property in Baldwin County, Alabama, as follows:

Commence at a point on the West end of North Lane Bridge on the centerline of U.S. Highway #90; THENCE N 10 degrees 56 minutes 00 seconds E, 108.00 feet to a point on the North right-of-way line of U. S. Highway #90 for a POINT OF BEGINNING; THENCE N 79 degrees 04 minutes 00 seconds W, for a distance of 209.30 feet; THENCE N 10 degrees 56 minutes 00 seconds E, 200 feet; THENCE S 79 degrees 04 minutes 00 seconds E, for a distance of 158.30 feet to a point on the West bank of Blakeley River, THENCE S 11 degrees 17 minutes 09 seconds E, for a distance of 216.04 feet to a point on the said North right-of-way line; THENCE N 79 degrees 04 minutes 00 seconds W, for a distance of 30.70 feet to the POINT OF BEGINNING.

And the Plaintiff claims jointly and severally to the above described real property and the improvements thereon owned by the Defendants in Baldwin County, Alabama.

  
LEON DUKE

United States Land Development Company may be served at Star Route 1, Daphne, Alabama.

Langhorn Construction Company, Inc., may be served by the Secretary of State who has been appointed duly authorized agent.

FILED

JAN 16 1960

ALICE J. DUCK, CLERK  
REGISTER



SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4558

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

The Pineda Club, Inc., a Corp., William Langhorn Construction Co., Inc. &

United States Land Development Company

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 The Pineda Club, Inc. a Corp.

William Langhorn Construction Co., Inc. & United States Development Co., Defendant .....

by SMITH-KELLY SUPPLY COMPANY, INC. A CORP.

Plaintiff.....

Witness my hand this 16th day of January 1951.....

Alice J. Duck, Clerk

**THE STATE OF ALABAMA**  
BALDWIN COUNTY**CIRCUIT COURT****SMITH-KELLY SUPPLY COMPANY, INC.**

A Corporation

Plaintiffs

vs.

**THE PINEDA CLUB, INC. A Corp.**  
**WILLIAM LANCHORN CONSTRUCTION CO.**  
**INC. & UNITED STATES LAND**  
**DEVELOPMENT COMPANY**

Defendants

**SUMMONS and COMPLAINT**

Filed

**FILED**

, 19

JAN 16 1961

, Clerk

ALICE J. DUCK, CLERK  
REGISTER

LEON DUKE

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

SMITH-KELLY SUPPLY COMPANY,  
INC., a corporation

Plaintiff

VS.

THE PINEDA CLUB, INC.,  
a corporation, WILLIAM  
LANGHORN CONSTRUCTION COMPANY,  
INC., and UNITED STATES  
LAND DEVELOPMENT COMPANY

Defendants

X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA

X

X

X

X

CIVIL DIVISION

X CASE NO. \_\_\_\_\_

The Plaintiff claims of the Defendants ONE THOUSAND  
TWO HUNDRED SEVENTY-ONE AND 31/100 (\$1,271.31) DOLLARS  
with the interest thereon due from them by accounts dated  
on, to-wit, August 19, 1960, for materials furnished by the  
Plaintiff to the Defendants at their request on, to-wit,  
August 10, 1960, which sum of money with the interest thereon  
is still due and unpaid.

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West along the said North right of way line a  
distance of 1110.53 feet to a point; thence North-  
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a distance of 90 feet to a point of curvature of  
a 407.89 foot radius curve to the right (which  
curve has a central angle of 21 degrees, 57 minutes,  
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said curve a distance of 156.34 feet to a point of  
reverse curve of a 487.89 foot radius curve to the  
left (which curve has a central angle of 21 degrees,  
57 minutes, 40 seconds); thence Northeastwardly along  
the arc of said curve a distance of 187.01 feet to

the point of tangency; thence North 10 degrees, 56 minutes East a distance of 30 feet to a point of curvature of a 25 foot radius curve to the right (which curve has a central angle of 90 degrees, 00 minutes); thence Northeastwardly along the arc of said curve a distance of 39.27 feet to a point of tangency on the South right of way line of Caribbean Boulevard; thence South 79 degrees 04 minutes East along the South right of way line of Caribbean Boulevard and the projection thereof a distance of 867.90 feet to a point on the West bank fo Blakeley River; thence Southeastwardly along the meanders of the said West bank a distance of 598 feet more or less to a point on the North right of way line of U.S. Highway No. 90, said point bears South 79 degrees, 04 minutes East a distance of 30.70 feet from the point of beginning; thence North 79 degrees, 04 minutes West a distance of 30.70 feet to the point of beginning of the above described property.

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LEON DUKE

United States Land Development Company may be served at Star Route 1, Daphne, Alabama.

Langhorn Construction Company, Inc., may be served by the Secretary of State who has been appointed duly authorized agent.

FILED

JAN 16 1961

ALICE J. DUCK, CLERK  
REGISTER

Please send Lukes check  
back. He will find address for Sher.  
service. Hold receipt