

4169

BALDWIN COUNTY.)

You are hereby commanded to summon U. S. LAND DEVELOPMENT CORPORATION, a Florida corporation licensed to do business in the State of Alabama, 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, Alabama, at the place of holding same by ECONOMY ELECTRIC CONSTRUCTION CO., INC., an Alabama corporation.

EA-1-27-61

Beica aduak
Clerk

* * * * *

ECONOMY ELECTRIC CONSTRUCTION
CO., INC., an Alabama corporation,

PLAINTIFF

VS:

U. S. LAND DEVELOPMENT CORPORATION,
a Florida corporation licensed to
do business in the State of Alabama,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The plaintiff claims of the defendant ONE THOUSAND SIX HUNDRED EIGHTEEN & 22/100 DOLLARS (\$1,618.22), due from it by account on, to wit: the 17th day of November, 1960, which sum of money, with interest thereon, is still unpaid.

The plaintiff claims of the defendant ONE THOUSAND SIX HUNDRED EIGHTEEN & 22/100 DOLLARS (\$1,618.22), due from it on account stated between the plaintiff and the defendant on, to wit: the 17th day of November, 1960, which sum of money, within interest thereon, is still unpaid.

The plaintiff claims of the defendant ONE THOUSAND SIX HUNDRED EIGHTEEN & 22/100 DOLLARS (\$1,618.22), due from it for merchandise, foods and chattels sold by the plaintiff to the defendant on, to wit: the 17th day of November, 1960, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 23rd day of January, 1961.

1961.

Paul Chan
Attorney for Plaintiff

FILED

25 1961

ANCE L. DUCK, CLERK
REGISTER

BALDWIN COUNTY, ALABAMA
AT LAW

ECONOMY ELECTRIC CONSTRUCTION CO.,
INC., an Alabama corporation;

PLAINTIFF

VS:

U. S. LAND DEVELOPMENT CORPORA-
TION, a Florida corporation
licensed to do business in the
State of Alabama,

DEFENDANT

SUMMONS AND COMPLAINT

Received 25th day of January 1961
and on 27 day of Jan 1961
served a copy of the within S. and C.
U. S. Land Development Corp

by service on Lickey Ryer
Manager

TAYLOR WILKINS, Sheriff
By W. B. Kainer D. S.

I hope

Sheriff claims 20 miles at
Ten Cents per mile 7.00
TAYLOR WILKINS, Sheriff

BY Dermis
DEPUTY SHERIFF

FILED

JAN 25 1961

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

STATEMENT

Economy Electric Construction Co., Inc.

Mobile, Alabama, U. S. A.

Date November 17 1960U.S Land Development Co.Star RouteDaphne, Ala.

| DATE | DESCRIPTION | AMOUNT |
|---------|------------------|------------|
| 6/27/60 | Invoice No 338 A | \$ 1618 22 |

STATE OF ALABAMA,)

MOBILE COUNTY.)

H. R. BRYARS, first being duly sworn, deposes and says that he is President of Economy Electric Construction Co., Inc., the plaintiff in this case, and that the U.S. Land Development Co. is indebted in the amount of \$1,618.22 after allowing all just credits.


 H. R. Bryars

Sworn to and subscribed before me
 this the 23rd day of January, 1961.


 Notary Public

Economy Electric Const. Co. Inc.

P. O. Box 306

Mobile, Alabama

ECONOMY ELECTRIC CONSTRUCTION CO.,
INC., an Alabama Corporation,

Plaintiff

VS

U. S. LAND DEVELOPMENT CORPORATION
A Florida Corporation licensed to
do business in the State of Alabama

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

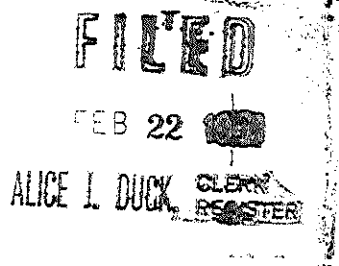
AT LAW

Comes now the defendant in the above styled cause and for answer to the Bill of Complaint filed in the above styled cause says:

ONE: As to Count 1: "Not guilty".

TWO: As to Count 2: "Not guilty".

THREE: As to County 3: "Not guilty".



Attorney for Defendant

ECONOMY ELECTRIC CONSTRUCTION CO. X

Plaintiff X

IN THE CIRCUIT COURT OF

VS X

BALDWIN COUNTY, ALABAMA

THE PINEDA CLUB, INC. X

AT LAW

NO. 5287

Defendant X

Comes the defendant and for answer to the complaint in the above styled cause, and to each paragraph thereof separately and severally says as follows:

-1-

It denies the allegations of said complaint.

THOMPSON & WHITE

BY: 

Attorneys for defendant.

*Filed 2-14-61
Airtel-remitted
work*

ECONOMY ELECTRIC CONSTRUCTION CO.,
INC., an Alabama Corporation

Plaintiff

-VS-

U. S. LAND DEVELOPMENT CORPORATION

A Florida Corporation licensed to

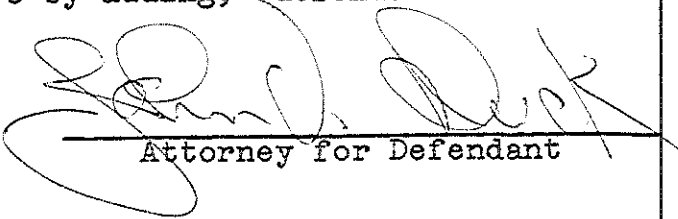
do business in the State of Alabama.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

CASE NO. 4569

Comes now the defendant in the above styled cause and amends its answer filed heretofore by adding, "defendant demands trial by jury."


Attorney for Defendant

FILED

APR 7 1961

ALICE J. DUCK, CLERK
REGISTER