IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH JUDICIAL CIRCUIT

OF ALABAMA

RADCLIFF MATERIALS, INC., a corporation,

Plaintiff,

Vs.

THE PINEDA CLUB, INC. a corporation,

Defendant.

CASE NO. 4590

JUDGMENT

On this the 3rd day of April, 1961 came the Plaintiff and it appearing that default had been made by the Defendant, proof was had touching the lien claimed and the amount of the indebtedness, whereby the Court does find that the Defendant is indebted to the Plaintiff in the amount of \$3,904.38 and that the Plaintiff is entitled to said sum and to a lien upon the property described in the Complaint for said amount. It is therefore,

ORDERED, ADJUDGED AND DECREED by the Court that the Plaintiff do have and recover from the Defendant the sum of \$3,904.38 together with costs of this cause and that a lien upon said property described in the Complaint, situated in Baldwin County, Alabama, viz.:

From a point on the center line of the West and of the North bridge across the Blakeley River on U. S. Highway No. 90 run South 79 degrees 04 minutes East 30 feet along the center line of said bridge to a point; thence run North 10 degrees 56 minutes East 108 feet to the point of beginning on the North right-of-way of U. S. Highway No. 90; thence North 79 degrees 04 minutes West along the said North right-of-way line of U. S. Highway No. 90 a distance of 1165 feet to a point; thence North 10 degrees 56 minutes East a distance of 160 feet to a point of curvature; thence along the arc of a circular curve to the right, having a radius of 407.889 feet, an arc distance of 156.341 feet to a point of diverse curvature; thence along the arc of a circular curve to the

left, having a radius of 487.889 feet, an arc distance of 187.004 feet to a point of curvature; thence along the arc of a circular curve to the right having a radius of 25 feet, an arc distance of 39.27 feet to a point of tangency; thence South 79 degrees 04 minutes East, a distance of 687.591 feet to a point of curvature; thence along the arc of a circular curve to the left, having a radius of 25 feet, an arc distance of 39.26 feet to a point; thence South 79 degrees 04 minutes East, a distance of 135.336 feet to a point on the Westerly Shore of Blakeley River, thence South 11 degrees 35 minutes East, a distance of 622.451 feet to the point of beginning

س کر جہ پہ

be and the same is hereby established and declared in favor of said Plaintiff for said amount, and the said property is hereby condemned and ordered sold for the satisfaction of this judgment as provided by law.

Shibus

RADCLIFF MATERIALS, INC.,

a corporation,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

VS:

: AT LAW

THE PINEDA CLUB, INC.,

a corporation,

NO. 4590

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.

Jobert M stee

JUN 3 1. 61

ANCE L DUCK CLERK
REGISTER

RADCLIFF MATERIALS, INC., a corporation,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

VS:

AT LAW

THE PINEDA CLUB, INC., a corporation,

NO. _____

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



VICKERS, RIIS, MURRAY AND GURRAN

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

MARION R, VICKERS
ERLING RHS, JR.
J. MANSON MURRAY
EDWIN J. CURRAN, JR.

February 3, 1961

MAILING ADDRESS: POST OFFICE BOX 990 HEMLOCK 2-8767

Mrs. Alice J. Duck, Register & Clerk Circuit Court of Baldwin County Bay Minette, Alabama

In re: Radcliff Materials, Inc. vs.
The Pineda Club, Inc.

Dear Mrs. Duck:

Attached hereto is a complaint to be filed in the above noted matter. Will you please see that this suit is properly filed and that a copy of the complaint and summons is served on the defendant.

Thanking you, we are

Yours truly,

VICKERS, RIIS, MURRAY AND CURRAN

Erling Riis, Jr.

ER:SJB

Att (2)

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH JUDICIAL CIRCUIT OF ALABAMA

RADCLIFF MATERIALS, INC., a corporation,

Plaintiff,

Vs.

CASE NO. 4590

THE PINEDA CLUB, INC. a corporation,

Defendant.

JUDGMENT

On this the 3rd day of April, 1961 came the Plaintiff and it appearing that default had been made by the Defendant, proof was had touching the lien claimed and the amount of the indebtedness, whereby the Court does find that the Defendant is indebted to the Plaintiff in the amount of \$3,904.38 and that the Plaintiff is entitled to said sum and to a lien upon the property described in the Complaint for said amount. It is therefore,

ORDERED, ADJUDGED AND DECREED by the Court that the Plaintiff do have and recover from the Defendant the sum of \$3,904.38 together with costs of this cause and that a lien upon said property described in the Complaint, situated in Baldwin County, Alabama, viz.:

From a point on the center line of the West and of the North bridge across the Blakeley River on U. S. Highway No. 90 run South 79 degrees 04 minutes East 30 feet along the center line of said bridge to a point; thence run North 10 degrees 56 minutes East 108 feet to the point of beginning on the North right-of-way of U. S. Highway No. 90; thence North 79 degrees 04 minutes West along the 1 North right-of-way line of U. S. Highway No. distance of 1165 feet to a point; thence h 10 degrees 56 minutes East a distance of feet to a point of curvature; thence along irc of a circular curve to the right, having lius of 407.889 feet, an arc distance of 41 feet to a point of diverse curvature; e along the arc of a circular curve to the

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be and the same is hereby established and declared in favor of said Plaintiff for said amount, and the said property is hereby condemned and ordered sold for the satisfaction of this judgment as provided by law.

Hubert M 3 teer

RADCLIFF MATERIALS, INC., a IN THE GIRCUIT COURT OF COrporation,

Plaintiff, SALD-IN COUNTY, ALASAMA

Vs. Game No. 4590

THE PINEDA CLUB, INC., a corporation,

PETITION TO SET ASIDE DEFAULT JUDGMENT

comes now your Potitioner, The Pineda Club, Inc., by and through their Attorneys, Mamilton, Denniston, Batler & Riddick, and moves the Court to set spide the judgment by default heretofore rendered in this cause and for grounds there-of show unto the Court as follows:

- l. The Defendant had employed counsel in Say Minette to represent it generally in suits involving this Defendant.
- 2. The Defendant was informed that its counsel was to appear in this case.
- 3. The Defendant's former counsel falled to appear for the Defendant in this cause.
- 4. Ponding completion of final arrangements for withdrawal of Defendant's former counsel and substitution of Defondant's present counsel, the Plaintiff, on April 4, 1961, took a default judgment against the Defendant.
- 5. That, as the Court record will show, on April 13, 1961, Defendant's former counsel withdrew his representation and the Defendant's present counsel, Esmilton, Demniston, Butler & Riddick, appeared on the Defendant's behalf.
- 6. That the Jeferdant first learned that Defendant's former counsel had not appeared in this cause and that default judgment was taken against the Defendant through investigation of the Court's records in the Clerk's office on April 13, 1961 by the Defendant's present counsel of record.

- 7. That the Plaintiff's claim herein arises from being a sub-emutractor of William Langhorns, Inc. or of Sateman
 Construction Company, Inc. in furnishing supplies and materials to said contractors in construction of certain improvements
 located on the Defendant's property described in the complaint,
 all as appears upon the face of Exhibit & attached hereto.
- 3. That said general contractors, William Langhorns, Inc. and/or Bateman Construction Company, Inc. are not made parties to this suit.
- 9. That said general contractors are becausery and essential parties to a lier suit against the owners of the property as is required by Title 33. Section 56. Code of Alabama (1940).
- 10. That this motion is made within thirty days of the entry of said default judgment.

MEREPORE, Defendant moves the Court to set swide said judgment by default, allowing Defendant a ressonable to plead, answer or demor.

MANIETON, DENVISION, BUTCOM & RIPOLCK

Mille al desire

SEATE OF ALABAMA)

COUNTY OF MOSTLE)

defore me, the undersigned authority, personally appeared Stenley winn, who first being duly sworn, on oath deposes and says that he is the duly authorized agent of The Fineda Club, Inc., to make this affidavit, that he has been informed, and on such information does believe, and upon such information and belief does say that the matters and facts set forth in the foregoing patition to set aside default judgment are true and correct to the best of his information, which and provising.

Statisty Line

every and subscribed to before so this ? They are sprii, 1961

APR 19 1961

HILL & WILL STERK

NOTETY PUBLIC, NOOLLO COUNTY, ALREADS
HAMILTON, DENNISTON, BUTLER & RIDDICK
MOBILE, ALABAMA

RADCLIFE WATERIALS, INC.

McDuffie Island . MOBILE, ALABAMA . P. O. Drawer 946 . HEmlock 3-5585

December 22, 1960

Pineda Club, Inc. Star Moute One Daphne, Alabama

entlemen:

This is to advise that your following contractors are indepted to made. I.f Materials, inc. for materials used in construction of jour properties.

William Laughorne, Inc. 4 3,303.62 Sameman Construction Company, Inc. 4 310.90

In view of the fact that we have been made to collect these amounts, we are taking this method of advising for that if settlement is not made of January 3, lyol, we are to come of this letter advising our attorners to file alea or your properties, and to take further necessary legal action for the collection of these accounts.

Trusting that this action will not be necessary.

Sinceres; yours,

PADOLIFF NATE CLAIS, NO.

M. L. Griffin Assistant Treasurer

1LC:mhp

cc: William Langhorne, Inc.
Dateman Construction Company, Inc.
Vickers, Riis, Wurray & Surras.
Mr. L. M. Torbert
Mr. J. C. Stallings, Jr.

Russie Shellie

READY-MIX CONCRETE . RADMIX ASPHALT . SAND . GRAVEL . SHELLS . MORTAR

EXHIBIT A 250

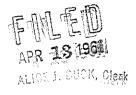
RADCLIFF MATERIALS, INC., a	IN THE CIRCUIT COURT OF
corporation	MALDWIN COUNTY, ALABAMA
Plaintiff	Ĭ
VS	NO. 4590
THE PINEDA CLUB, INC., a corporation	Ĭ
Defendant	Q

WITHDRAWAL OF APPEARANCE

Come(s) C Lewpin Thompson, attorney
who have (has) either formally appeared in the above styled
cause by filing a written appearance or pleading in said
cause, or else informally appeared in said cause, in behalf
of the Pineda Club, Inc.
and withdraw(s) their (his) appearance as counsel as afore-
said in said cause.
- Liftingon

APPEARANCE

_	Come HAMILTON, DENNISTON, BUTLER & RIDDICK, by
1	Milu G-Widemire, and file this their initial appear-
	ance in the above styled cause as counsel for The Pineda Club,
	and move that said Defendant (Re-
	spondent) be granted a continuance with respect to the
	above case set for a hearing on,
	in said cause, in order to give them a reasonable opportunity
	to familiarize themselves with said cause and to prepare what-
	ever pleadings and proof may be necessary and proper in their
	representation as aforesaid.



By: Miller a. Widemire

HAMILTON, DENNISTON, BUTLER & RIDDICK

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH JUDICIAL CIRCUIT

OF ALABAMA

RADCLIFF MATERIALS, INC., a corporation,

Plaintiff,

vs.

THE PINEDA CLUB, INC. a corporation,

Defendant

CASE NO. 459)

COMPLAINT

Plaintiff claims of the defendant the sum of, to-wit, \$3,828.81 plus interest thereon, for materials and supplies furnished by the Plaintiff at the request of the agent of Defendant on a building or improvement on the following described property situated in Baldwin County, Alabama, viz.:

From a point on the center line of the West and of the North bridge across the Blakely River on U. S. Highway No. 90 run South 79 degrees 04 minutes East 30 feet along the center line of said bridge to a point; thence run North 10 degrees 56 minutes East 108 feet to the point of beginning on the North right-of-way of U. S. Highway No. 90; thence North 79 degrees 04 minutes West along the said North right-of-way line of U. S. Highway No. 90 a distance of 1165 feet to a point; thence North 10 degrees 56 minutes East a distance of 160 feet to a point of curvature; thence along the arc of a circular curve to the right, having a radius of 407.889 feet, an arc distance of 156.341 feet to a point of diverse curvature; thence along the arc of a circular curve to the left, having a radius of 487.889 feet, an arc distance of 187.004 feet to a point of curvature; thence along the arc of a circular curve to the right having a radius of 25 feet, an arc distance of 39.27 feet to a point of tangency; thence South 79 degrees 04 minutes East, a distance of 687.591 feet to a point of curvature; thence along the arc of a circular curve to the left, having a radius of 25 feet, an arc distance of 687.591 feet to a point of curvature; thence along the arc of a circular curve to the left, having a radius of 25 feet, an arc distance of 39.26 feet to a point; thence South 79 degrees 04 minutes East, a distance of 135.336 feet to a point on the Westerly Shore of Blakeley River, thence South 11 degrees 35 minutes East, a distance of 622.451 feet to the point of beginning.

which said indebtedness accrued on, to-wit, the 1st day of September 1960 and is still due and unpaid.

Plaintiff alleges that the above described property is the property of THE PINEDA CLUB, INC., a corporation, the Defendant in this cause; that said materials and supplies were furnished and used on the above described premises under and by virtue of a contract with the agent of the Defendant; and that within six months after the said indebtedness had matured, on to-wit, the 25th day of January 1961, Plaintiff did file in the office of the Judge of Probate of Baldwin County, Alabama, a verified statement as required by law, which is attached hereto and made a part hereof.

WHEREFORE, Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

VICKER, RIIS, MURRAY AND CURRAN

B17 •

Attorneys for Plainti

STATE OF ALABAMA, COUNTY OF MOBILE.

RADCLIFF MATERIALS, INC. files this statement in writing, verified by the oath of LEON M. TORBERT, who has personal knowledge of the facts herein set forth that said Radcliff Materials, Inc. claims a lien upon the property situated in the County of Baldwin, State of Alabama, and described on Exhibit A which is attached hereto and made a part hereof as though fully set out herein.

This lien is claimed separately and severally as to both the buildings and improvements thereon and the said land.

That said lien is claimed to secure an indebtedness of, to-wit, \$3,828.81, with interest from, to-wit, December 30, 1960, for materials furnished and used in the construction of a building located on said property.

The name of the owner or proprietor of said property is THE PINEDA CLUB, INC., an Alabama corporation.

RADCLIFF MATERIALS, INC.

STATE OF ALABAMA, COUNTY OF MOBILE.

Subscribed and sworn to

before me this the 13 day of January, 1961.

Public,

a Notary Public in SELDEN S. KEARNS Before me, and for the County of Mobile, State of Alabama, personally appeared LEON M. TORBERT, who, being duly sworn, deposes and says:

That he has personal knowledge of the facts set forth in the foregoing statement of lien and that the same are true and correct to the best of his knowledge and belief.

TORBERT LEON M.

STATE OF ALABAMA BALDWIN COUNTY

I certify that this instrument was filed on

JAN 25 1981 8:20

ALIGE J. DUCK, Clark

Mobile County, Alabama

242

EMMIBIT A

From a point on the center line of the West and of the North bridge across the Blakeley River on U.S. Highway No. 90 run South 79 degrees 04 minutes East 30 feet along the center line of said bridge to a point; thence run North 10 degrees 56 minutes East 108 feet to the point of beginning on the North right-of-way of U.S. Highway No. 90; thence North 79 degrees 04 minutes west along the said North right-of-way line of U.S. Highway No. 90 a distance of 1165 feet to a point; thence North 10 degrees 56 minutes Bast a distance of 160 feet to a point of ourvature; thence along the arc of a circular curve to the right, having a radius of 407,389 feet, an are distance of 156.341 feet to a point of diverse curvature; thence along the arc of a circular curve to the left, having a radius of 487.889 feet. In aro distance of 187.004 feet to a point of correture; thence along the are of a circular duriesto the right having a radius of 25 feet, an arcidiatance of 39.27 feet to a point of tangency; thence South 79 degrees 04 minutes East, a distance of 587.591 feet to a point of curvature; thence along the are of a circular curve to the left, having a radius of 25 feet, an arc distance of 39.26 feet to a point; thence South 79 degrees 04 minutes East, a distance of 135.336 feet to a point on the Westerly Shore of Blakeley River, thence South 11 degrees 35 minutes East, a distance 522,451 feet to the point of beginning.

From a point on the center line of the West and U. S. Highest No. 90 run South 9 degrees Of minutes Sast 30 feet along the center line of said bridge to a point; thence run North 10 degrees 50 minutes Sast along the center line of said said North 10 degrees 95 minutes Sast along the said North 10 degrees 95 minutes Sast a distance of said North 10 degrees 95 minutes Sast a distance of 150 feet to a point, thence along the are of curvature; thence along the are of a distance of the said to a point of distance of the said the are of a distance of the said to a point of the said to a distance of the said and the said to a distance of the said and the said to a distance of the said and the said the said to a distance of the said and the said the said and the said the sai

The State of Alabama, Baldwin County.	Circuit Court, Baldwin County No. 4590 TERM, 19
TO ANY SHERIFF OF THE	STATE OF ALABAMA
You Are Commanded to Summon	THE PINEDA CLUB, INC. A CORP.
·	
	our, within thirty days from the service hereof, to the complaint filed in
	JB, INC. A CORP. Defendant
byRADCLIFF MA	ERIALS, INC. A CORP.
	, Plaintiff
Witness my hand this 6th	February 61
	alie Jule, Clerk
	

No. 75 Page Page	
STATE of ALABAMA Baldwin County	Defendant lives at
CIRCUIT COURT	Received In Office
RADCLIFF MATERIALS INC. A CORP.	2/6, 19_6/
Plaintiffs	Sheriff. I have executed this summons
vs. THE PINEDA CLUB, INC. A CORP.	this 10 1-16 19 let by leaving a copy with
Defendants Summons and Complaint	Stanley Winn Lief of Timita Clark
Filed February 6, 1961 19 Alice J. Duck Clerk	Sheriff claims of miles of miles of TAYLOR WILKINS, Sheriff BY
ELECTRICAL MANAGEMENT AND	
Plaintiff's Attorney	Jaylas Wilkins Sheriff.
Defendant's Attorney	W.O. Rainer
	Deputy Sheriff.

THE	STATE	OF	ALABAMA	

CIRCUIT COURT

Term, 19

Radcliff Material, inc. 4 yes No. 6590 vs. The Poneda Clark

BILL OF COSTS

20. Application—Habeas Corpus 6.00 21.	CLERK'S FEES:	AMOUNT		SUMMARY OF FEES, COSTS AND JUDGMENT:	AMOUNT	
### Total Clerk's Fees ### 22. Judgment ### \$. ### SHERIFF'S FEES: 23. Serving summons and complaint ### \$1.50 24. Levying attachment and return ### 6.25 25. Seizing personal property—Detinue ### 6.00 26. Approving bond, each ### 2.00 27. Serving Garnishee—Writ ### 1.50 28. Serving Sei. Fa. or notice ### 1.50 29. Serving subpoenas, each ### 7.75 30. Impanelling Jury ### 7.75 31. Serving Contempt Attachment ### 1.50 32. Collecting execution for cost only ### 1.50 33. Commissions on Execution ### 2.50 34. Executing Writ of Possession, each ### 5.00 35. Making Deed to Real Estate sold, each ### 2.50 36. Mileage, each ### 2.50 37	1. Suits for \$100.00 or less \$ 6.00 2. Suits for over \$100.00 but less than \$1000 10.00 3. Suits for \$1000.00 and over 20.00 4. Suits Detinue, ejectment, etc. 10.00 5. Suits not otherwise provided for 10.00 6. Appeal from Justice of Peace, etc. 6.00 7. Garnishment on Judgment, etc. 6.00 8. Workmen's Compensation—Petition Settlement 10.00 9. Appeals from State Dept. of Pub. Safety, etc. 10.00 10. Motion to sell real estate—J. P. levy 6.00 11. Mandamus, writ of prohibition, etc. 15.00 12. Recording Executions—State Agencies 3.00 13. Copy of Record—per 100 words .15 14. Certifying Abstract in transcript 5.00 15. Record for Supreme-Appeals Ct. per 100 wds .15 16. Additional copies Record-Appeals per 100 wds .05 17. Taking Appeal Bond .75 18. Reporter's Transcript on Appeal 10.00 19. Appeals Courts Concurrent Jurisdiction 15.00 20. Application—Habeas Corpus 6.00	5	00	1. Clerk's Fees 2. Ex-Clerk's Fees 3. Sheriff's Fees 4. Ex-Sheriff's Fees 5. Trial Tax 6. Court Reporter's Fee, per day\$ 7. Witness Fees 8. Commissioner's Fees 9. Garnishee's Fees 10. Publisher's Fees 11. 12. 13. Clerk's Fees in Inferior Court 14. Sheriff's Fees in Inferior Court 15. Witness Fees in Inferior Court 16. 17. Justice of Peace Fees 18. Constable's Fees 19. 20. Cost in Appealed Cases Docketed (Total) TOTAL FEES AND COST	20 1	300
30,	### Total Clerk's Fees ### SHERIFF'S FEES: 23. Serving summons and complaint		50	22. Judgment \$ 23. 10% Damages \$ 24. Interest \$ TOTAL JUDGMENT TOTAL FEES, COST AND JUDGMENT		

HAMILTON, DENNISTON, BUTLER & RIDDICK

ATTORNEYS & COUNSELLORS AT LAW AMERICAN NATIONAL BANK BUILDING

P. O. BOX 1671

THOMAS A.HAMILTON ROBERT P. DENNISTON CHARLES R.BUTLER HARRY H. RIDDICK ROBERT R. LOCKLIN MILLER A. WIDEMIRE MOBILE, ALABAMA

April 18, 1961

PETER HAMILTON (1838-1888) THOMAS A.HAMILTON (1844-1897) J. GAILLARD HAMILTON (1899-1956)

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

Re: McPhillips Manufacturing Co., Inc., Vs. The Pineda Club

(No. 4589).

Radcliff Materials, Inc. Vs. The Pineda Club (No. 4590).

Dear Mrs. Duck:

I am enclosing herewith an original and one copy of a motion to set aside the judgments in each of the two cases above.

We would appreciate your having the necessary notice prepared and served as required by Title 7, Section 569.

Service can be obtained on the Honorable Erling Riis, Jr., of the firm of Vickers, Riis, Murray and Curran, Attorneys for the Plaintiff in each of the above two cases.

Yours very truly,

For the Firm

MAW/mcm 14,586

cc:

Mr. Stanley Winn

Mr. Richard G. Garrett

P.S. We would appreciate your letting us know when the motion is set. Thanks.

M. A. W.

Mrs. Duck - I understand it will be ricersary for these motions to be specially continued if They fall after 30 days foundate of judgment. Made

THE STATE OF ALABAMA

BILL OF COSTS

COUNTY	}			Term, 19
Mc Philips My No. 4589 vs. J The Paneda	<u> </u>	<u> </u>		
CLERK'S FEES:	AMOI		OF COSTS	
1. Suits for \$100.00 or less\$ 6.00	-1.401		SUMMARY OF FEES, COSTS AND JUDGMENT	
2. Suits for over \$100.00 but less than \$1000 10.00 3. Suits for \$1000.00 and over	20	00	1. Clerk's Fees 2. Ex-Clerk's Fees 3. Sheriff's Fees 4. Ex-Sheriff's Fees 5. Trial Tax 6. Court Reporter's Fee, per day\$ 7. Witness Fees 8. Commissioner's Fees 9. Garnishec's Fees 10. Publisher's Fees 11. 12. 13. Clerk's Fees in Inferior Court 14. Sheriff's Fees in Inferior Court 15. Witness Fees in Inferior Court 16. 17. Justice of Peace Fees 19. 20. Cost in Appealed Cases Docketed (Total) TOTAL FEES AND COST	753
22.			22. Judgment 4-3-161 8	4153 57
Total Clerk's Fees SHERIFF'S FEES:	200	0	23. 10% Damages\$	
23. Serving summons and complaint \$ 1.50	13	0	24. Interest S	
24. Levying attachment and return 6.25 25. Seizing personal property—Detinue 6.00 26. Approving bond, each 2.00 27. Serving Garnishee—Writ 1.50 28. Serving Sci. Fa. or notice 1.50			TOTAL FEES, COST AND JUDGMENT	
29. Serving subpoenas, each .75 30. Impanelling Jury .75 31. Serving Contempt Attachment 1.50 32. Collecting execution for cost only 1.50 33. Commissions on Execution				
44. Executing Writ of Possession, each 5.00 5. Making Deed to Real Estate sold, each 2.50 6. Mileage, each .10	60	0 -		
7	1			i

VICKERS, RIIS, MURRAY AND CURRAN

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

Mobile, Alabama

MARION R. VICKERS
ERLING RIIS, JR.
J. MANSON MURRAY
EDWIN J. CURRAN, JR.

October 20, 1961

MAILING ADDRESS: POST OFFICE BOX 990 HEMLOCK 2-8767

Mrs. Alice J. Duck Register in Clerk Circuit Court of Baldwin County Bay Minette, Alabama

In re: McPhillips Manufacturing Co., Inc. vs. The Pineda Club, Inc. At Law Case No. 4589

Radcliff Materials, Inc. vs. The Pineda Club, Inc. At Law Case No. 4590

Dear Mrs. Duck:

Enclosed herewith is a copy of what I believe is the judgement rendered in each of the above noted cases. Will you please verify this and if such is the case, prepare for us a Certified Certificate certifying that such copy is a true and correct copy of the judgement entered in the respective case. In any event, what I desire is to have a Certified Copy of the judgement.

Thanking you for your attention in this matter, we are

Yours truly,

VICKERS, RIIS, MURRAY AND CURRAN

Erling ATis, Jr.

ER/jp Enclosure