

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

P. O. BOX 71

March 14, 1961

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

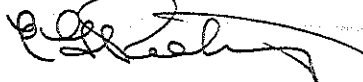
Inre: City of Fairhope
Vs : The Pineda Club, Inc.
Case: No. 4594
File: "P"

Request you enter judgment by default in the sum of
\$1,658.00 in the case of City of Fairhope vs. The
Pineda Club, Inc.

Suit was filed on an open account, being \$1,633.50,
plus interest accrued from the 10th of December, 1960,
being \$24.50, and costs. Please, also, send down the
certificate of judgment, along with cost bill.

Thanks.

Sincerely,



ts
3/22/61
cc: City of Fairhope

CITY OF FAIRHOPE,
a municipal corporation,

Plaintiff,

VS:

THE PINEDA CLUB, INC.,
a corporation,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

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 same 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

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

FILED

1961 05 14
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF FAIRHOPE, a Municipal
Corporation

Plaintiff

THE PINEDA CLUB, INC., a
corporation

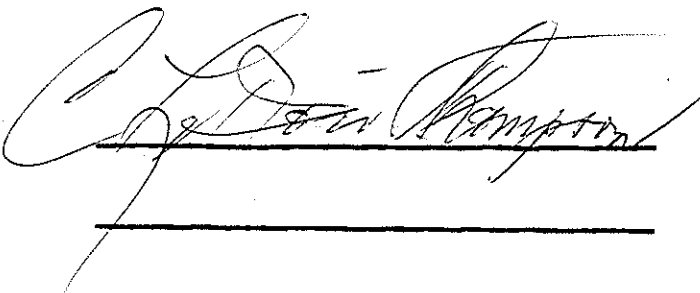
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

No. 4594

WITHDRAWAL OF APPEARANCE

Come(s) C. LeVair 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.



APPEARANCE

Come HAMILTON, DENNISTON, BUTLER & RIDDICK, by Miller A. Widemire, and file this their initial appear-
ance in the above styled cause as counsel for The Pineda
Club, Inc.... 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.

FILED
APR 13 1961
ALICE J. DUK, Clerk

HAMILTON, DENNISTON, BUTLER & RIDDICK

By: Miller A. Widemire

CITY OF FAIRHOPE, a	:	
municipal corporation,	:	
Plaintiff,	:	IN THE CIRCUIT COURT OF
VS:	:	BALDWIN COUNTY, ALABAMA
THE PINEDA CLUB, INC.,	:	AT LAW
a corporation,	:	NO. 4594
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 3 1961

ALICE J. DUCK, CLERK
REGISTER

Robert M. Stone
Judge

CITY OF FAIRHOPE,	:	
a municipal 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:

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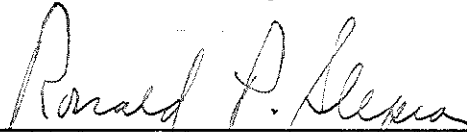
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captioned lawsuit be stayed and that the Plaintiff therein be enjoined and restrained until final decree in the bankruptcy proceedings from doing any act or commencing any other proceedings in stated cause until a final decree or order therein, and 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.

CITY OF FAIRHOPE, a
Municipal Corporation,

Plaintiff,

VS

THE PINEDA CLUB, INC., a
Corporation,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SIX HUNDRED THIRTY-THREE and 50/100 (\$1,633.50) Dollars due from it by account, on to-wit, the 10th day of December, 1960; which sum of money with the interest thereon is still unpaid.


COUNT II

The Plaintiff claims of the Defendant the sum of ONE THOUSAND SIX HUNDRED THIRTY-THREE and 50/100 (\$1,633.50) Dollars due from it for water furnished by the Plaintiff to the Defendant between the 1st day of September, 1960, and the 28th day of November, 1960; which sum of money with the interest thereon is still unpaid.

FILED

FEB 9 1961

ALICE J. DUCK, CLERK
REGISTER


Attorney for the Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon _____

THE PINEDA CLUB, INC., 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 _____

THE PINEDA CLUB, INC., a corporation, Defendant. _____

by THE CITY OF FAIRHOPE, a municipal corporation, _____

_____, Plaintiff. _____

Witness my hand this _____

9

day of _____

Feb

19 61

Deirdre. reuck

_____, Clerk

No. 4594

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

THE CITY OF FAIRHOPE, a

municipal corporation

Plaintiffs

vs.

THE PINEDA CLUB, INC., a

corporation

Defendants

Summons and Complaint

Filed

FILED

19

FEB 9 1961

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

E. G. Rickarby, Fairhope, Ala.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Star Route 1, Daphne, Ala.

Received In Office

2-9-, 1961

Sheriff.

I have executed this summons

this 10 Feb 1961

by leaving a copy with

Stanley Winn
Secy. of Pineda Club,
Inc.

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff

BY Dennis
DEPUTY SHERIFF

Taylor Wilkins
Sheriff.
W.O. Garner
Deputy Sheriff.

Causeway