

HUBERT KIMBROUGH,  
As Trustee in the Matter of  
MOBILE PRODUCE COMPANY, INC.,  
a Corporation, in Bankruptcy  
in the United States District  
Court for the Southern District  
of Alabama, Southern Division,  
No. 13669,

Plaintiff,

v

THE JOHN DOE COMPANY, a corporation,  
partnership, or individual proprietor-  
ship, whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing business  
as the SILVER KING RESTAURANT, and  
THE RICHARD ROE COMPANY, a corpora-  
tion, partnership, or individual  
proprietorship, whose correct name  
is unknown, but which will be added  
by amendment when ascertained, doing  
business as the G & R FOOD SERVICE,  
Jointly and severally,

Defendants.

Comes now the Plaintiff in the above styled cause and  
amends the caption therein so that it shall read as fully as  
hereinafter set out:

HUBERT KIMBROUGH,  
as Trustee in the Matter of  
MOBILE PRODUCE COMPANY, INC.,  
a Corporation, in Bankruptcy  
in the United States District  
Court for the Southern District  
of Alabama, Southern Division,  
No. 13669,

Plaintiff,

v

SILVER KING RESTAURANT, INC.,  
a corporation, and G & R FOOD  
SERVICE, INCORPORATED, a corp-  
oration, jointly and severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4602

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4606

LYONS, PIPES & COOK  
Attorneys for Plaintiff

BY:

Gordon B. Kahn

FILED

MAR 16 1961

ALICE L. DICKSON CLERK  
REGISTER

HUBERT KIMBROUGH,  
As Trustee in the Matter of  
MOBILE PRODUCE COMPANY, INC.,  
a Corporation, in Bankruptcy  
in the United States District  
Court for the Southern District  
of Alabama, Southern Division,  
No. 13669,

Plaintiff,

v

THE JOHN DOE COMPANY, a corporation,  
partnership, or individual proprietor-  
ship, whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing business  
as the SILVER KING RESTAURANT, and  
THE RICHARD ROE COMPANY, a corpora-  
tion, partnership, or individual  
proprietorship, whose correct name  
is unknown, but which will be added  
by amendment when ascertained, doing  
business as the G & R FOOD SERVICE,  
Jointly and severally,

Defendants.

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IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 11602

Comes now the Plaintiff in the above styled cause and  
amends the caption therein so that it shall read as fully as  
hereinafter set out:

HUBERT KIMBROUGH,  
as Trustee in the Matter of  
MOBILE PRODUCE COMPANY, INC.,  
a Corporation, in Bankruptcy  
in the United States District  
Court for the Southern District  
of Alabama, Southern Division,  
No. 13669,

Plaintiff,

v

SILVER KING RESTAURANT, INC.,  
a corporation, and G & R FOOD  
SERVICE, INCORPORATED, a corp-  
oration, jointly and severally,

Defendants.

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IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 11606

LYONS, PIPES & COOK  
Attorneys for Plaintiff

BY:

Gordon B. Kahn

FILED

MAR 6 1981

ALICE L. BUCK, CLERK  
REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

February 16, 1961

JOSEPH H. LYONS (1900-1957)  
SAM W. PIPES, III  
WALTER M. COOK  
FRANK T. POPE, JR.  
GORDON B. KAHN  
IRWIN W. COLEMAN, JR.

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

Dear Mrs. Duck:

We enclose herewith an original and two copies of a  
complaint which we ask be served on the Defendants at  
the Silver King Restaurant located on the Mobile Bay  
Causeway in Baldwin County.

Very truly yours,

LYONS, PIPES & COOK

  
Gordon B. Kahn

GBK:mb

HUBERT KIMBROUGH,  
as Trustee in the Matter of  
MOBILE PRODUCE COMPANY, INC.,  
a Corporation, in Bankruptcy  
in the United States District  
Court for the Southern District  
of Alabama, Southern Division,  
No. 13669,

Plaintiff,

v

THE JOHN DOE COMPANY, a corpora-  
tion, partnership, or individual  
proprietorship, whose correct name  
is unknown, but which will be added  
by amendment when ascertained,  
doing business as the SILVER KING  
RESTAURANT, and THE RICHARD ROE  
COMPANY, a corporation, partner-  
ship, or individual proprietorship,  
whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing  
business as the G & R FOOD SERVICE,  
jointly and severally,  
Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4602

COUNT ONE

Plaintiff claims of the Defendant Seven Hundred Fifty-six  
and 10/100 (\$756.10) Dollars due from them by account on, to-wit,  
the 23rd day of December, 1960, which sum of money with the  
interest thereon, is still unpaid.

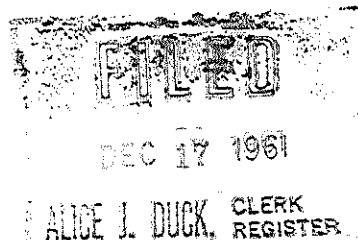
COUNT TWO

The Plaintiff claims of the Defendant Seven Hundred Fifty-  
six and 10/100 (\$756.10) Dollars due from them for merchandise,  
goods and chattels sold by the Plaintiff to the Defendant, which  
sum of money with the interest thereon has been due and payable  
since, to-wit, December 23rd, 1960, and is still unpaid.

*Lyons, Pipes and Cook*  
LYONS, PIPES & COOK  
Attorneys for the Plaintiff

Defendants may be served at:

Silver King Restaurant  
Mobile Bay Causeway  
Baldwin County, Alabama



SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4602

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon The John Doe Company and The Richard Roe 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 John Doe Company  
and The Richard Roe Company, Defendant .....

by Hubert Kimbrough, as Trustee in the Matter of MOBILE PRODUCE COMPANY, INC., a  
corporation, in Bankruptcy in the United States District Court for the Southern Division  
Plaintiff.....

Witness my hand this 17 day of February 19 61.....

W. J. Luck, Clerk

No. 4602

Page .....

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

HUBERT KIMBROUGH, as trustee in the  
Matter of MOBILE PRODUCE COMPANY, INC.  
a corporation, in Bankruptcy in the  
U. S. District Court for the Southern Div.

Plaintiffs

vs.

THE JOHN DOE COMPANY, et als

Defendants

SUMMONS and COMPLAINT

Filed 2-17, 1961

Alice J. Duck, Clerk

Defendant lives at

RECEIVED IN OFFICE

2/17, 1961

Sheriff

I have executed this summons

this Feb 17, 1961

by leaving a copy with

The John Doe Co.

The Richard Lee Co.

Eus Lulas  
President of Richard Lee Co.  
~~Richard Lee Co.~~

Sheriff claims 120 miles at

Ten Cents per mile Total \$ 12.00

TAYLOR WILKINS, Sheriff

BY James  
DEPUTY SHERIFF

Plaintiff's Attorney

Defendant's Attorney

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

may be served at  
Silver King Restaurant

HUBERT KIMBROUGH,  
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ship, whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing business  
as the SILVER KING RESTAURANT, and  
THE RICHARD ROE COMPANY, a corpora-  
tion, partnership, or individual  
proprietorship, whose correct name  
is unknown, but which will be added  
by amendment when ascertained, doing  
business as the G & R FOOD SERVICE,  
Jointly and severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4602

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SILVER KING RESTAURANT, INC.,  
a corporation, and G & R FOOD  
SERVICE, INCORPORATED, a corp-  
oration, jointly and severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 4606

LYONS, PIPES & COOK  
Attorneys for Plaintiff

BY: Gordon B. Kahn  
Gordon B. Kahn

