

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

SEA RANCH RESTAURANT,
a Partnership composed of
GUS GULAS and NICK GULAS,

Defendant.

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IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO.

4666

COUNT ONE

Plaintiff claims of the Defendant One Thousand Thirty-eight and 15/100 (\$1,038.15) 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.

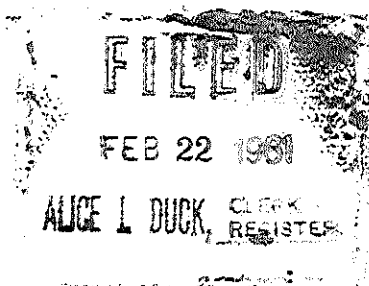
COUNT TWO

The Plaintiff claims of the Defendant One Thousand Thirty-eight and 15/100 (\$1,038.15) 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 AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Sea Ranch Restaurant
Mobile Bay Causeway
Baldwin County, Alabama



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

SEA RANCH RESTAURANT,
a Partnership composed of
GUS GULAS and NICK GULAS,

Defendant.

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IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO.

4686

COUNT ONE

Plaintiff claims of the Defendant One Thousand Thirty-eight and 15/100 (\$1,038.15) 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.

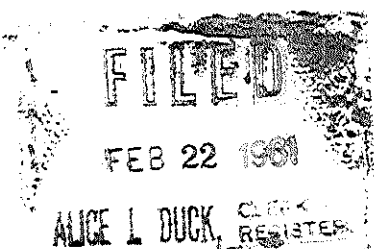
COUNT TWO

The Plaintiff claims of the Defendant One Thousand Thirty-eight and 15/100 (\$1,038.15) 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 AND COOK
Attorneys for the Plaintiff

Defendant may be served at:

Sea Ranch Restaurant
Mobile Bay Causeway
Baldwin County, Alabama



SUMMONS AND COMPLAINT

Baldwin Time

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4606

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SEA RANCH RESTAURANT, A Partnership composed
of GUS GULAS & NICK GULAS

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 ~~XXXXXXXXXXXXXXXXXXXX~~

GULAS

~~XXXXXX~~ SEA RANCH RESTAURANT, A Partnership Composed of GUS GULAS & NICK Defendant

by HUBERT KIMBROUGH, As Trustee in the Matter of MOBILE PRODUCE COMPANY, INC.

A Corp., In Bankruptcy in the U.S. District Court, Plaintiff.....

Witness my hand this 22 day of February 19 61

Adrian J. Spence, Clerk

Ed 3-1-61

No. 4606

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HUBERT KIMBROUGH, As Trustee in the
Matter of MOBILE PRODUCE COMPANY, INC.
A Corp., in Bankruptcy in the U.S.
District Court

Plaintiffs

vs.

SEA RANCH RESTAURANT,

Defendants

SUMMONS and COMPLAINT

Filed February 22, 1961

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

2/22, 1961

Sheriff

I have executed this summons

this March 1, 1961

by leaving a copy with

Luz Sular
Nick Sular

Sherriff's office 120 miles of

Ten Cents per mile Total \$ 12.00

TAYLOR WILKINS, Sheriff

BY W.C. Gann Deputy SHERIFF

Taylor Wilkins Sheriff

W.C. Gann Deputy Sheriff

Bauseman

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

FRANK T. POPE, JR.

GORDON D. KAHN

IRWIN W. COLEMAN, JR.

February 21, 1961

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 defendant at
the Sea Ranch Restaurant located on the Mobile Bay
Causeway in Baldwin County.

Very truly yours,

LYONS, PIPES & COOK


Gordon B. Kahn

GBK:mb

Encls.

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

May 24, 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

Re: Hubert Kimbrough, etc. vs Sea Ranch Restaurant
In the Circuit Court of Baldwin County, Alabama
Case No. 4606 and Hubert Kimbrough, etc. vs Silver
King Restaurant, Inc. and G & R Food Service, Case
No. 4602.

Dear Mrs. Duck:

We would appreciate it very much if you would let us
know the amount of the Court costs in the above mentioned
cases.

Very truly yours,

LYONS, PIPES AND COOK


Gordon B. Kahn

GBK:mb