

STATE OF ALABAMA,
BALDWIN COUNTY,

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon U. S. Land Development Corporation, a corporation, to appear within 30 days from service of this process, in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the complaint of Martin H. Seiler.

Witness my hand, this 18 day of March, 1961.

Cliff. Duck
Clerk

Ex. 2-20-61

MARTIN H. SEILER,

Plaintiff

VS.

U. S. LAND DEVELOPMENT CORPORATION, A CORPORATION,

Defendant

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
* CASE NO. 4645
*

Plaintiff claims of the defendant the sum of One Thousand Four Hundred Thirty-Seven and 43/100 (\$1,437.43) Dollars, with interest thereon, for work and labor done at the request of the defendant in beautifying and improving the following described real property situated in Baldwin County, Alabama, to-wit:-

Lots 4 to 15, inclusive, Block C, Pineda Island, Section One, a re-subdivision of a portion of Pineda Island Subdivision, Baldwin County, Alabama, according to a plat thereof recorded in Map Book 5, page 127 of the Probate Court records of Baldwin County, Alabama,

which said indebtedness accrued on to-wit, the 23rd day of September, 1960, and is now due and unpaid.

Plaintiff alleges that the above described real property is property of the defendant, U. S. Land Development Corporation; that said work and labor was done or performed on said land under and by virtue of a contract with the U. S. Land Development Corporation, the owner or proprietor thereof; that within six (6) months after said

indebtedness had matured on, to-wit, the 23rd day of September, 1960, plaintiff did file in the office of the Judge of Probate of Baldwin County, Alabama, a verified statement as required by law, a copy of which is attached hereto, made a part hereof and marked Exhibit "A".

WHEREFORE, plaintiff claims a lein for said amount upon said land and the buildings and improvements situated thereon.

SULLIVAN & CAMERON
Attorneys for the Plaintiff

By *W. C. Sullivan*

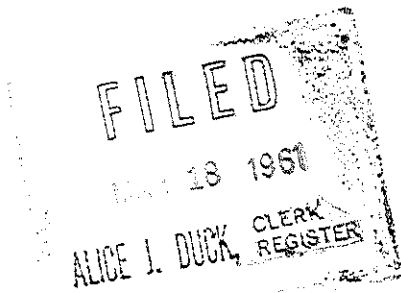


EXHIBIT "A"

STATE OF ALABAMA)

Martin H. Seiler files this statement in writing, verified by the oath of Martin H. Seiler, who has personal knowledge of the facts herein set forth:

That said Martin H. Seiler claims a lien upon the following

lots 4 to 15, inclusive, Block "C", Pineda Island, Section One, a re-subdivision of a portion of Pineda Island Subdivision, Baldwin County, Alabama, according to a plat thereof recorded in Map Book 5, page 127 of the Probate Court records of Baldwin County, Alabama.

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 \$1,437.43 with interest, from to-wit: the 23rd day of September, 1960, for beautifying, improving, and for work and labor done upon said land, according to the itemized statement attached hereto and made a part of this claim.

The name of the owner or proprietor of the said property is U. S. Land Development Corporation.

/s/ Martin H. Seiler

Claimant

Before me, Jos. C. Sullivan, a Notary Public in and for the County of Mobile, State of Alabama, personally appeared Martin H.

personally and under oath, and 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.

/s/ Martin H. Seiler

Martin H. Seiler, (Affiant)

Subscribed and sworn to before me on this the 20th day of January, 1961.

/s/ Jos. C. Sullivan

NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

JAN 20 1961 8:00A.M.

ex & Lien

5

481-84

WILLIAM H. SEILER, LANDSCAPE ARCHITECT
WM. R. MCCLROY, CIVIL ENGINEER



U. S. Land Development Office
Mobile 16101
Birmingham, Ala.

MARTIN H. SEILER

LANDSCAPE CONTRACTOR

15 LANCASTER ROAD

SPRING HILL STATION

MOBILE ALABAMA

PHONE GA 6-6838

LANDSCAPE ARCHITECT
AND LANDSCAPER

TO PROFESSIONAL SERVICES

Balance Aug. 31, 1960

September Maintenance

\$1287.13

Balance

250.00
\$1537.13

MARTIN H. SEILER, LANDSCAPE ARCHITECT
WM. H. MURPHY, CIVIL ENGINEER



MARTIN H. SEILER

LANDSCAPE CONTRACTOR

18 LANCASTER ROAD

SPRING HILL STATION

MOBILE, ALABAMA

PHONE CA 6-4835

U. S. Land Development Corp.
Pineda Island
Daphne, Ala.

1960

TO PROFESSIONAL SERVICES

Plants for Spring Hill Station

\$287.73

6 Hoses and 2 Sprinklers

15.48

Maintenance of Lawns & Plantings May 1960

25.00

Maintenance of Lawns & Plantings June 1960

\$287.00

Maintenance of Lawns & Plantings July 1960

350.00

\$2387.43

MARTIN H. SEILER, LANDSCAPE ARCHITECT
WM. H. McLEOD, CIVIL ENGINEER



MARTIN H. SEILER

LANDSCAPE CONTRACTOR

116 LANCASTER ROAD

SPRING HILL STATION

MOBILE ALABAMA

PHONE CA 9 4218

U. S. Civil Designation Office
1010 Bay View Drive,
Fort Lauderdale, Fla.

TO PROFESSIONAL SERVICES

March Balance
Lose a Sprinklers
Maintenance Month. 6. May
Maintenance Month of June

107.12
57.58
350.00
280.00

1037.10



MARTIN H. SPILER

LANDSCAPE CONTRACTOR

18 LANCASTER ROAD

SPRING HILL STATION

MOBILE, ALABAMA

PHONE GA 6-4838

COPY

AUGUST 12, 1960

U. S. Land Development Corp.,
Pineda Island
Daphne, Ala.

TO PROFESSIONAL SERVICES

Pineda Island Rec'd, 11-

Balance Aug. 1, 1960

1257.43

Less payment 6-1,-60

110.00

Balance

1037.43

Maintenance for August

250.00

Balance

\$1257.43

August maintenance was \$100.00 less due to rain.
Maintenance will decrease further during the winter
months if continued.

MARTIN H. SEILER, LANDSCAPE ARCHITECT
JAMES R. MCELROY, CIVIL ENGINEER



MARTIN H. SEILER

LANDSCAPE CONTRACTOR

16 LANCASTER ROAD

SPRING HILL STATION

MOBILE, ALABAMA

PHONE GA 6-4038

U. S. Land Development Corp.
1010 Bay View Drive
Fort Lauderdale, Florida

1960

TO PROFESSIONAL SERVICES

Plants per statement March 29, 1960

\$ 257.12

6 Houses and 1 Apartment (Wakeland).

66.48

Maintenance Florida Island plantings & lawn

33.10

\$ 257.12

MARTIN H. SEILER, LANDSCAPE ARCHITECT
DR. R. MCILROY, CIVIL ENGINEER



MARTIN H. SEILER

LANDSCAPE CONTRACTOR

16 LANCASTER ROAD

SPRING HILL STATION

U. S. Land Development Corp. - MOBILE, ALABAMA

Pineda Island,

Daphne, Ala.

PHONE GA 6-4835

COPY

LANDSCAPE
AND APES DESIGNED
BY EXECUTED

2-29-60

TO PROFESSIONAL SERVICES

16 Shamrock Ivy

12 Azaleas

20 "

2 Ilex bullata

1 Camellia

5 Red Wood Palms 2' x 1"

6 Rubber Plants

10 Hosted Plants

Mowing and Cleanup 16 hrs.

1 Shamrock Ivy	1.00	16.00
10-12"	2.00)	
10-12"	2.00)	61.00
21-30"	3.00	6.00
3-4'	10.00	10.00
	1.75	25.75
	2.00	12.00
	1.75	93.00
	2.00	26.00

\$267.75

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.

No. _____

Circuit Court, Baldwin County

Moore P.

Pg. Co.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

TERM, 19____

You Are Hereby Commanded to Summon _____

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 _____

by _____, Defendant _____

Witness my hand this _____ day of _____, 19____

_____, Clerk

No. 4645

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

Martin J. Seiler

Plaintiffs

vs.

U.S. Land Development
Corporation a corp

Defendants

Summons and Complaint

Filed 3-18 1961

Alice Mueck Clerk

to be served on
Donald H. Dryer,
Fairhope, Ala

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 20 1961

Taylor Wilkins, Sheriff

I have executed this summons

this 20 March 1961

by leaving a copy with

Donald D. Dryer

Sheriff claims 70 miles at

Ten Cents per mile Total 7.00

TAYLOR WILKINS, Sheriff

BY

Barnes
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. O. Barnes Deputy Sheriff

F. Hope

MARTIN H. SEILER,
Plaintiff

-VS-

U. S. LAND DEVELOPMENT COR-
PORATION, A CORPORATION,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

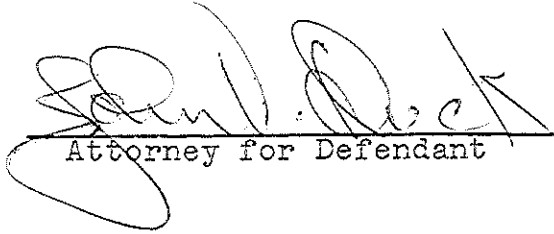
AT LAW

CASE NUMBER. 4646

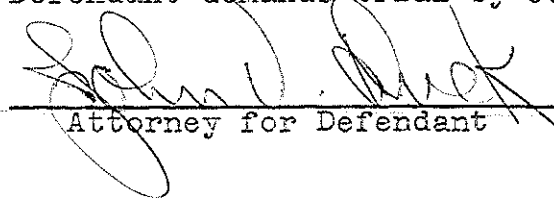
ANSWER

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

"Not guilty."


Attorney for Defendant

Defendant demands trial by Jury


Attorney for Defendant

FILED
MAR 24 1961
ALICE J. DUCK, CLERK
REGISTER

MARTIN H. SEILER,

Plaintiff

VS

U. S. LAND DEVELOPMENT

CORPORATION, A CORPORATION

Defendant

Case No. 4646

MARTIN H. SEILER,
Plaintiff

-VS-

U. S. LAND DEVELOPMENT COR-
PORATION, A CORPORATION,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER. 4645

ANSWER

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

"Not Guilty."

MARTIN H. SEILER,

AS

FILED

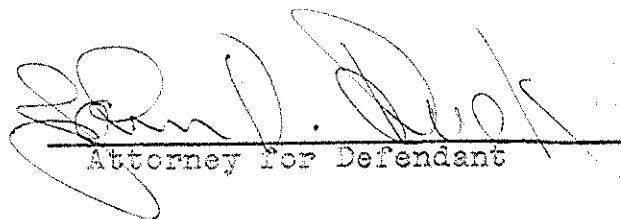
MAR 24 1961

ALICE J. DUCK,

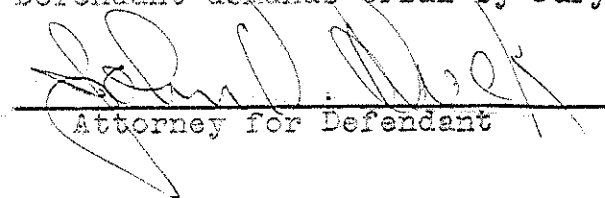
CLERK
REGISTER

Case No. 11010

Defendant


Attorney for Defendant

Defendant demands trial by Jury


Attorney for Defendant

MARTIN H. SEILER,

Plaintiff

VS

U. S. LAND DEVELOPMENT
CORPORATION, A CORPORATION
Defendant

Case No. 4646

comes now the Defendant in the above styled case for

VENUE

Declaratory

FORFEITURE & CONFESSION
U. S. LAND DEVELOPMENT CORP.

-AS-

DISTRICT

WILLIAM H. SEILER

OFFICE NUMBER 1010

AT LAW

BYRONIA COUNTY, VIRGINIA

IN THE CIRCUIT COURT OF

Declaratory judgment filed by plaintiff

Approved for Defendant

Approved for Plaintiff

SULLIVAN & CAMERON

ATTORNEYS AT LAW

SUITE 512 ANNEX FIRST NATIONAL BANK BUILDING

POST OFFICE BOX 275

MOBILE, ALABAMA

JOSEPH C. SULLIVAN
ALLAN R. CAMERON

March
17th
1961

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

Re: Martin H. Seiler vs. U. S.
Land Development Corporation
Circuit Court - At Law
Baldwin County, Alabama

Dear Mrs. Duck:

Will you please file the enclosed Complaint and Summons.

Service may be had on the Defendant, U. S. Land Development Corporation by serving Donald D. Dryer, manager and agent of U. S. Land Development Corporation, whose address is 156 White Avenue, Fairhope, Alabama.


Will you please return to me copy of enclosed letter showing date which this Complaint was filed.

Thanking you and with kindest personal regards, I am

Very truly yours,

SULLIVAN & CAMERON

By



Joseph C. Sullivan

J

C

S

/dj

Encl.

SULLIVAN & CAMERON
ATTORNEYS AT LAW
SUITE 512 ANNEX FIRST NATIONAL BANK BUILDING
POST OFFICE BOX 275
MOBILE, ALABAMA

JOSEPH C. SULLIVAN
ALLAN R. CAMERON

August
23rd
1962

Mrs. Alice J. Duck, Clerk-Register
Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Martin H. Seiler vs. U. S.
Land Development Company.
Case No. 4645

Dear Mrs. Duck:

This will acknowledge notice of the above case being set for trial on Monday, September 10, 1962. Under date of July 28, 1962, we requested Judge Hall to enter an order showing the withdrawal of our firm as attorneys of record for the Plaintiff in this case and we notified Mr. Seiler of our action in this case and advised him that if he wished to pursue this case further that he should secure other attorneys. I am sending Mr. Seiler a copy of this letter in order that he may know that this case has been set for September 10, 1962.

Very truly yours,

SULLIVAN & CAMERON

By 

Joseph C. Sullivan

J

C

S

/dj

cc: Mr. Martin H. Seiler