

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

August 21, 1961

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

41646

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

Re: Hubert Kimbrough, Trustee in the matter of Mobile  
Produce Company, Inc. vs Langham's Clover Farm  
In the Circuit Court of Baldwin County, Alabama

Dear Mrs. Duck:

As attorneys for the Plaintiff in the above-mentioned  
cause, we respectfully request that the case be dismissed  
on motion of the Plaintiff. We further request that the  
Cost Bill be forwarded to Langham's Clover Farm c/o Mr.  
James R. Owen, Attorney at Law, Bay Minette, Alabama.

Thank you for your cooperation in this matter.

Very truly yours,

LYONS, PIPES AND COOK

  
Gordon B. Kahn

GBK:mb

cc: Mr. James R. Owen  
Attorney at Law  
Bay Minette, Alabama

Mr. Hubert Kimbrough, Trustee  
529 First National Bank Building  
Mobile, Alabama

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IRWIN W. COLEMAN, JR.

March 17, 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  
Langham's Clover Farm, Highway 31, Bay Minette, Alabama.

Very truly yours,

LYONS, PIPES & COOK

  
Gordon B. Kahn

GBK:mb

Encl.

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. 13,669,

Plaintiff,

v

THE JOHN DOE COMPANY,  
a corporation, partnership,  
or individual proprietorship,  
whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing  
business as LANGHAM'S CLOVER FARM,

Defendant.

\* IN THE CIRCUIT COURT  
\* OF BALDWIN COUNTY,  
\* ALABAMA

\*

\*

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\*

\*

CASE NO. \_\_\_\_\_

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. 13,669,

Plaintiff, \*

v

LANGHAM'S CLOVER FARM,  
a partnership, composed  
of Lloyd G. Langham and  
Tommy M. Langham,

Defendant. \*

\* IN THE CIRCUIT COURT OF  
\* BALDWIN COUNTY, ALABAMA  
\* AT LAW

\* CASE NO. 4646

LYONS, PIPES AND COOK  
Attorneys for Plaintiff

BY:

Gordon B. Kahn  
Gordon B. Kahn

FILED

APR 6 1961

ALICE J. DUCK, 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. 13,669,

Plaintiff,

V

THE JOHN DOE COMPANY,  
a corporation, partnership,  
or individual proprietorship,  
whose correct name is unknown,  
but which will be added by amend-  
ment when ascertained, doing  
business as LANGHAM'S CLOVER FARM,

Defendant.

\*

IN THE CIRCUIT COURT

\*

OF BALDWIN COUNTY,

\*

ALABAMA

\*

\*

\*

\*

\*

CASE NO. 4646

COUNT ONE

Plaintiff claims of the Defendant Two Thousand Seventy-one and 47/100 (\$2,071.47) 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 Two Thousand Seventy-one and 47/100 (\$2,071.47) 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 Plaintiff

Defendant may be served at:

Langham's Clover Farm  
Highway 31  
Bay Minette, Alabama

FILED

3-18-61

118 ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4646

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon The John Doe Co., a Corp., Partnership or Ind.

Proprietorship whose name is unknown but which will be added by amendment

when ascertained, d/b/a/ LANGHAM'S CLOVER FARM

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 CO.,

d/b/a LANGHAM'S CLOVER FARM, Defendant.

by HUBERT KIMBROUGH, as Trustee in the Matter of ~~MOBILE~~ MOBILE PRODUCE CO., INC.,

A Corp. in Bank ruptcy & in the U.S. District Court for the Southern District  
of Ala., Southern Division No. 13,669, Plaintiff.

Witness my hand this 18 day of March 19 61

Alice J. Duck Clerk

No. 4646

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

HUBERT KIMBROUGH, As Trustee in the  
~~XXXXXXHNNXBBEXX~~,  
Matter of MOBILE PRODUCE CO., INC.

Plaintiffs

vs.

THE JOHN DOE CO., A CORP. - - -

d/b/a LANGHAM'S CLOVER FARM

Defendants

Summons and Complaint

Filed March 18, 1961

Alice J. Duck

Clerk

Lyons, Pipes & Cook

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 20 1961

Taylor Wilkins Sheriff

I have executed this summons

this 3-20 1961

by leaving a copy with

The John Doe Co.  
and Lloyd Langham

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

Omni

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

April 5, 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  
an amended Complaint which we request that you file  
in the Circuit Court of Baldwin County, Alabama.  
Please return one of the enclosed copies marked filed  
at your earliest convenience.

Very truly yours,

LYONS, PIPES & COOK



Gordon B. Kahn

GBK:mb

Encl.