

CAGLE, JONES AND WAINWRIGHT, INC.
A CORPORATION

Plaintiff

-VS-

U. S. LAND DEVELOPMENT CORPORATION
A CORPORATION

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4659

MOTION TO SET ASIDE JUDGMENT

Comes now the Defendant in the above styled cause and moves the court to set aside judgment heretofore rendered in this case and for grounds therefor says:

That the Defendant filed an answer prior to the taking of the judgment.

John I. Duck
Attorney for Defendant

FILED

JUL 31 1961

ALICE I. DUCK, CLERK
REGISTER

BK. — page 54 A

John J. Duck

CAGLE, JONES and WAINWRIGHT, INC.,
a Corporation,

Plaintiff

VS

U. S. LAND DEVELOPMENT CORPORATION,
a Corporation,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. _____

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

ONE. Not guilty.

John J. Duck
Attorney for Defendant

Defendants demand a trial by Jury.

John J. Duck
Attorney for Defendant

Filed 4-7-61
John J. Duck

CAGLE, JONES AND WAINWRIGHT,
INC., A Corporation,

Plaintiff,

v

U. S. LAND DEVELOPMENT CORP-
ORATION, A Corporation,

Defendant.

* IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA

*

*

AT LAW

*

CASE NO.

4659

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COUNT ONE

The Plaintiff claims of the Defendant the sum of to-wit:
Two Thousand Nine Hundred Eighty-three and 55/100 (\$2,983.55)
Dollars, the balance due by promissory note executed by the
Defendant, on to-wit, the 26th day of September, 1960, and payable
on to-wit, the 26th day of January 1961.

And Plaintiff further avers that in said note, and as a part
of the consideration thereof, the Defendant waived demand, protest,
and notice of maturity, non-payment or protest and all requirements
necessary to hold it liable as maker. And Plaintiff further
avers that in said note and as a part of the consideration thereof,
the Defendant agreed to pay a reasonable attorney's fee, which
Plaintiff alleges and claims to be, to-wit, Six Hundred (\$600.00)
Dollars.

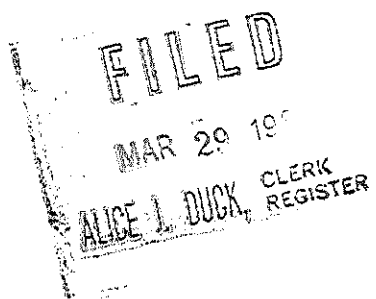
WHEREFORE, the Plaintiff claims of the Defendant the sum of
to-wit: Three Thousand Five Hundred Eighty-three and 55/100 (\$3,583.55)
Dollars.

LYONS, PIPES AND COOK
Attorneys for the Defendant

BY:

London B. Kah

Defendant may be served at its
office on the Mobile Bay Causeway.



CAGLE, JONES AND WAINWRIGHT,
INC., A Corporation,
Plaintiff,

-vs-

U. S. LAND DEVELOPMENT CORPO-
RATION, A Corporation,
Defendant.

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*
*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 4659

Comes now the Plaintiff in the above styled cause and shows unto this Honorable Court that a summons was heretofore issued out of this Court in the above styled cause, directed to U. S. Land Development Corporation, a corporation, Defendant herein, ordering the U. S. Land Development Corporation, a corporation, to appear and plead, answer or demur, within thirty (30) days from the service thereof to the Complaint in this cause, and that a copy of said summons was duly served upon the said U. S. Land Development Corporation, a corporation, by the proper officer on April 4th, 1961, and that the said Defendant has to the day hereof failed to plead, answer or demur to said Complaint;

WHEREFORE, Plaintiff moves that a judgment by default be entered against the said Defendant.

This the 22nd day of June, 1961.

LYONS, PIPES AND COOK
Attorneys for Plaintiff

BY: Gordon B. Kahn
Gordon B. Kahn

FILED

JUN 23 1961

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 14659

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon U.S. Land Development Corp., a Corp.

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

U.S. Land Development Corp., a corp., Defendant.

by Cagle, Jones, & Wainwright, Inc., a corp., Plaintiff.

Witness my hand this 30 day of March 1961.

W. J. Luck, Clerk

No. 4659

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

CAGLE, JONES & WAINWRIGHT, INC., A CORP.

Plaintiffs

vs.

U.S. LAND DEVELOPMENT CORP., A CORP.

Defendants

Summons and Complaint

Filed March 30, 1961

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 30 1961

Taylor Wilkins, Sheriff

I have executed this summons

this 4 April 1961

by leaving a copy with

Donald Dyer

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Garner
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. C. Garner Deputy Sheriff

Thope

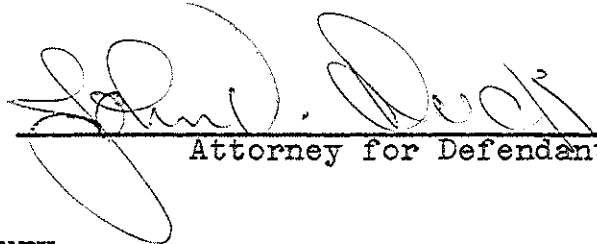
CAGLE, JONES and WAINWRIGHT, INC., | IN THE CIRCUIT COURT OF
a Corporation, |
 | Plaintiff | BALDWIN COUNTY, ALABAMA,

VS | | AT LAW

U. S. LAND DEVELOPMENT CORPORATION, | CASE NO. 4659
a Corporation, |
 | Defendant |

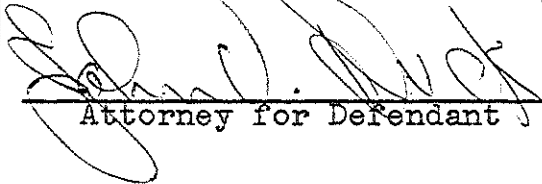
Comes now the Defendant in the above styled cause and for
answer to the Bill of Complaint filed herein, says:

ONE. Not guilty.



Attorney for Defendant

Defendants demand a trial by Jury.



Attorney for Defendant

FILED

APR 7 1967

ALICE L. DUCK, CLERK
REGISTER

54B

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 B. KAHN
IRWIN W. COLEMAN, JR.

March 29, 1961

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

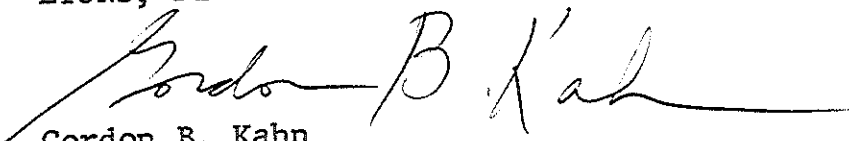
Dear Mrs. Duck:

We enclose herewith an original and two copies of
a complaint wherein Cagle, Jones and Wainwright, Inc.
is the plaintiff and U. S. Land Development Corporation
is the defendant. It would be appreciated if you would
file this complaint and return one of the copies marked
filed to this office.

Thank you for your assistance in this matter.

Very truly yours,

LYONS, PIPES & COOK


Gordon B. Kahn

GBK:mb

Encl.