

HUBERT KIMEROUGH,
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 BEN'S BAR B Q,

Defendant.

* IN THE CIRCUIT COURT

* OF BALDWIN COUNTY,

* ALABAMA

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CASE NO. 4674

COUNT ONE

Plaintiff claims of the Defendant Three Hundred Fifty-
one and 30/100 (\$351.30) 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 Three Hundred Fifty-
one and 30/100 (\$351.30) 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 Plaintiff

Defendant may be served at:

Ben's Bar B Q
Mobile Bay Causeway
Baldwin County, Alabama

FILED
APR 10 1961
ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4674

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THE JOHN DOE COMPANY, A Corp., Partnership or
Ind. Proprietorship whose correct name is unknown, but which will be added by
amendment when ascertained, doing business as BEN'S BAR B.Q.

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 Ben'S Bar B.Q., Defendant.

by HUBERT KIMBROUGH, As Trustee in the Matter of MOBILE PRODUCE CO., INC., A CORP.
in Bankruptcy in the U.S. District Court for the Southern District, Plaintiff
of Alabama, Southern Division No. 13669

Witness my hand this 10 day of April 1961

Alice J. Luck, Clerk

No. 4674

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

HUBERT KIMBROUGH, As Trustee in

The Matter of MOBILE PRODUCE CO. INC

Plaintiffs

vs.

THE JOHN DOE CO., A CORP.,

d/b/a BEN'S BAR B.Q.

Defendants

Summons and Complaint

Filed April 10, 1961

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

April 10 1961
Taylor Wilkins, Sheriff

I have executed this summons

this 4-19-1961

by leaving a copy with

Benjamin T. Smith

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY

Garner
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. D. Garner Deputy Sheriff

Causeway

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS 1890-1957
SAM W. PIPES, III
WALTER M. COOK
FRANK T. POPE, JR.
GORDON B. KAHN
IRWIN W. COLEMAN, JR.

October 11, 1961

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


Re: Hubert Kimbrough, as Trustee in the matter of Mobile
Produce Company, Inc., vs The John Doe Company d/b/a
Ben's Bar B Q, Case No. 4674 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. It would be appreciated if the
cost bill would be sent directly to this office.

Very truly yours,

LYONS, PIPES AND COOK


Gordon B. Kahn

GBK:mb

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

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.

April 7, 1961

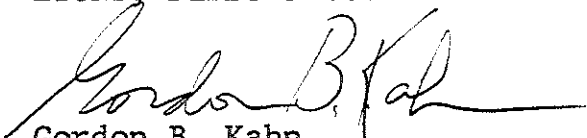
Honorable Alice J. Duck
Clerk of the Circuit Court of
Baldwin County, Alabama
Baldwin County Court House
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose herewith an original and two copies of
a complaint which we ask be served on the defendant
at Ben's Bar B Q located on the Mobile Bay Causeway
in Baldwin County. 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.