

RAYBON BROTHERS, INC.

Plaintiff,

vs.

BAYSIDE MOTEL CORPORATION,  
a corporation, and DAUPHIN  
CORPORATION, a corporation,  
separately and severally,

Defendants.

X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY,  
X ALABAMA.  
X AT LAW.  
X NO. 4676  
X  
X

COUNT I

The Plaintiff claims of the Defendants \$4,956.80, due from them by account on, to-wit, June 16, 1959, which sum of money, with the interest thereon, is still unpaid.

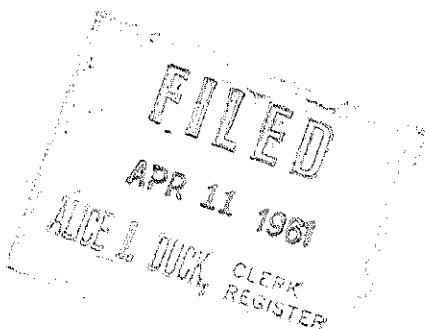
COUNT II

The Plaintiff claims of the Defendants \$4,956.80, due from them for work and labor done for the Defendants by the Plaintiff during the period between, to-wit, January 1, 1959 and, to-wit, June 19, 1959, at their request, which sum of money, with the interest thereon, is still unpaid.

  
Pierre Pelham  
Attorney for Plaintiff

Defendants may be served at:

Holiday Inn  
Mobile Bay Causeway



SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4676----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BAYSIDE MOTEL CORP., A Corp., &  
DAUPHIN CORP., A CORP., Separately and severally

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 BAYSIDE MOTEL CORP.,  
A CORP. & DAUPHIN CORP., A CORP., Separately & Severally, Defendant----

by RAYMON BROTHERS, INC.

\_\_\_\_\_, Plaintiff-----

Witness my hand this 11 day of April 1961..

Alvin - Luck, Clerk

RAYBON BROTHERS, INC.

Plaintiff,

vs.

BAYSIDE MOTEL CORPORATION,  
a corporation, and DAUPHIN  
CORPORATION, a corporation,  
separately and severally,

Defendants.

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY,

X ALABAMA.

X AT LAW.

X NO. 4676

X


X

COUNT I

The Plaintiff claims of the Defendants \$4,956.80, due from them by account on, to-wit, June 16, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendants \$4,956.80, due from them for work and labor done for the Defendants by the Plaintiff during the period between, to-wit, January 1, 1959 and, to-wit, June 19, 1959, at their request, which sum of money, with the interest thereon, is still unpaid.

  
Pierre Pelham  
Attorney for Plaintiff

Defendants may be served at:

Holiday Inn  
Mobile Bay Causeway

FILED

APR 11 1961

ALICE J. DUCK, CLERK  
REGISTER

TYSON & PELHAM

LAWYERS

SUITE 704

FIRST NATIONAL BANK ANNEX

MOBILE, ALABAMA

April 10, 1961

JOHN M. TYSON  
PIERRE PELHAM

HE 2-8786  
P. O. BOX 291

Clerk of the Circuit Court  
Baldwin County Court House  
~~Bay Minette, Alabama~~

Dear Sir:

Enclosed are the original and two copies of a  
complaint which I wish to file in the Circuit Court  
of Baldwin County.

Yours very truly,

  
Pierre Pelham

PP/wd

Enclosures


RAYBON BROTHERS, INC.           X    IN THE CIRCUIT COURT OF  
                                  X    BALDWIN COUNTY,  
Plaintiff,                       X  
vs.                               X    ALABAMA.  
                                  X  
BAYSIDE MOTEL CORPORATION,   X    AT LAW.  
a corporation, and DAUPHIN  
CORPORATION, a corporation,   X    NO. 4676  
separately and severally,     X  
                                  X  
Defendants.                       X

COUNT I

The Plaintiff claims of the Defendants \$4,956.80, due from them by account on, to-wit, June 16, 1959, which sum of money, with the interest thereon, is still unpaid.

COUNT II

The Plaintiff claims of the Defendants \$4,956.80, due from them for work and labor done for the Defendants by the Plaintiff during the period between, to-wit, January 1, 1959 and, to-wit, June 19, 1959, at their request, which sum of money, with the interest thereon, is still unpaid.



Pierre Pelham

Attorney for Plaintiff

Defendants may be served at:

Holiday Inn  
Mobile Bay Causeway

FILED

APR 17 1961

ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4676

TERM, 19

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against BAYSIDE MOTEL CORP.,

A CORP. & DAUPHIN CORP., A CORP., Separately & Severally, Defendant....

by RAYBON BROTHERS, INC.

Plaintiff....

Witness my hand this 11 day of April 1961...

N.F.

Eric J. Duck, Clerk

No. 4676

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

RAYBON BROTHERS, INC.,

Plaintiffs

vs.

BAYSIDE MOTEL CORP., A CORP. &

DAUPHIN CORP., A CORP., Separately  
& Severally Defendants

SUMMONS and COMPLAINT

Filed April 11, 1961

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

April 11, 1961  
Taylor Wilkins, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_  
by leaving a copy with

Returned 21 day of April, 1961  
Not found in my county after diligent search and  
quiry.

Taylor Wilkins, Sheriff  
By W. C. Earner  
Deputy Sheriff

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

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by RAYBON BROTHERS, INC.

Plaintiff.

Witness my hand this 11 day of April 1961

Archie J. Duck, Clerk