IN THE CIRCUIT COURT OF X RAYBON BROTHERS, INC. BALDWIN COUNTY. X Plaintiff, ALABAMA. X vs. AT LAW. BAYSIDE MOTEL CORPORATION, X a corporation, and DAUPHIN CORPORATION, a corporation, X separately and severally, 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



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THE STATE OF ALABAMA,	CIRCUIT COURT, BALDWIN COUNTY
BALDWIN COUNTY	No. 4676
	TERM, 19
TO ANY SHERIFF OF THE STATE OF A	AY ADAMA.
TO ANY SHERIFF OF THE STATE OF	ALADAMA:
The Association of the Common and the Common RA	TOTAL MANUEL ACTION & CO.
You Are Hereby Commanded to Summon BA	120 File 1900 Line 1900 and 19
DAUPHIN CORP., A CORP., Separat	ely and severally

	Sample of Same and Sa
the Circuit Court of Baldwin County, State of	Alabama, at Bay Minette, against BAYSIDE MOTEL COR
CORP. & DAUPHIN CORP., A CORP., Se	parately & Severally , Defendant
by RAYRON BROTHERS, INC.	
	Plaintiff
· · · · · · · · · · · · · · · · · · ·	, Flamui-
Witness my hand this	day of
	Alexander of the second of the
	Clerk

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

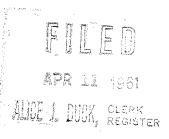
The Plaintiff claims of the Defendants \$4,956.80, due from them for work and labor done for the Defendants by the Plaintiff during the period between, to-wit, January 1, 1959 and, to-wit, June 19, 1959, at their request, which sum of money, with the interest thereon, is still unpaid.

Pierre Pelham

Attorney for Plaintiff

Defendants may be served at:

Holiday Inn Mobile Bay Causeway



TYSON & PELHAM

LAWYERS

SUITE 704

FIRST NATIONAL BANK ANNEX
MOBILE, ALABAMA

April 10, 1961

HE 2-8786 P. O. BOX 291

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

Dear Sir:

JOHN M. TYSON

PIERRE PELHAM

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. χ IN THE CIRCUIT COURT OF Plaintiff, χ BALDWIN COUNTY, vs. χ ALABAMA. BAYSIDE MOTEL CORPORATION, χ AT LAW. a corporation, and DAUPHIN CORPORATION, a corporation, X NO. _2//separately and severally, χ Defendants.

COUNT I

χ

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



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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.... RAYBON BROTHERS INC , Plaintiff___ Witness my hand this _____ __day of___April

1 To Winshington	A Company of the Comp
No. 4676 Page	
THE STATE OF ALABAMA BALDWIN COUNTY	Defendant lives at
CIRCUIT COURT	RECEIVED IN OFFICE
RAYBON BROTHERS, INC., Plaintiffs vs. BAYSIDE MOTEL CORP., A CORP. &	I have executed this summons this
W	
COURTER OURF. A CORP Consult 1.	
& Severally CORP., A CORP., Separately Defendants	Returned XI day of Comment
& Severally Defendants SUMMONS and COMPLAINT	Not found in my county after diligent search a
& Severally Defendants SUMMONS and COMPLAINT FiledApril 11,	Not found in my county after diligent search a quiry. Saylor Wilkins, Si By W. O. Marner
& Severally Defendants	Not found in my county after diligent search a quiry. Saylor Wilkins, Si By W. D. Slarner Deputy She
& Severally Defendants SUMMONS and COMPLAINT Filed April 11, ,19 61	Not found in my county after diligent search a quiry. Saylor Wilkins, Si By W. D. Slarner Deputy She
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	Moore Printing Co.
THE STATE OF ALABAMA BALDWIN COUNTY	circuit court, baldwin county
	No. 4676
	TERM, 19
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	AUADAMA:
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DAUPHIN CORP., A CORP., Separat	tely and server li-
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appear and plead, answer or demur, within t	hirty days from the service hereof, to the complaint filed in
	and any from the service hereor, to the complaint filed in
e Circuit Court of Baldwin County, State of	Alabama, at Bay Minette, against BAYSIDE MOTEL COR
URP. & DAUPHIN CORP., A CORP., Ser	parately & Severally, Defendant
	, Defendant
RAYBON BROTHERS, INC.	
	711 •
	, Plaintiff
tness my hand this 17	_day ofApril