

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

December 7, 1967

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

Mrs. Alice Duck, Clerk
Circuit Court
Baldwin County
Bay Minette, Alabama

Re: Mid-State Homes, Inc. vs. Cedric Mannich et ux

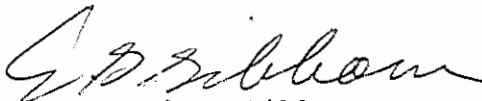
Dear Mrs. Duck:

I enclose herein an original and two copies of a complaint in ejectment in the above case. I would appreciate it if you would file the same in the Circuit Court of Baldwin County and issue it for service, and I would also appreciate it if you would confirm the filing date and also the date when service is perfected.

The defendant's address is Route 1, Silverhill, Alabama.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EKG:he

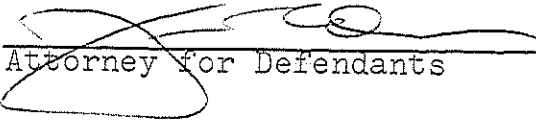
Enclosures

MID-STATE HOMES, INC.,)
a corporation,)
Plaintiff,)
VS.) IN THE CIRCUIT COURT OF
CEDRIC MANICH and DORIS) BALDWIN COUNTY, ALABAMA
MANICH a/k/a CEDRIC J.) AT LAW
MANNICH and DORIS M.)
MANNICH, Jointly and)
Individually,)
Defendant.)

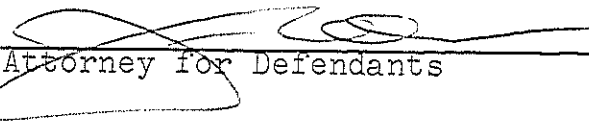
PLEA

Now comes the defendants in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof, separately and severally, say, separately and severally:

1. Not guilty.
2. The allegations of the said count are untrue.


Attorney for Defendants

Defendants demand a trial by jury of said cause.


Attorney for Defendants

FILED

FEB 7 1968

ALICE J. DUCK CLERK REGISTER

MID-STATE HOMES, INC.,)	IN THE CIRCUIT COURT OF
A Corporation,)	
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	
)	AT LAW
)	
CEDRIC MANICH and DORIS)	
MANICH a/k/a CEDRIC J.)	
MANNICH and DORIS M.)	
MANNICH, Jointly and)	
Individually,)	
)	
Defendants.)	CASE NO. <u>2898</u>

C O M P L A I N T

COUNT ONE

The plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama:

The West 125 feet of the Southwest Quarter of the Southeast Quarter of the Southeast Quarter, Section 4, Township 6 South, Range 3 East, containing ten acres more or less.

of which the plaintiff was in possession and upon which, pending such possession and before the commencement of this suit, the defendant entered and unlawfully withheld, together with \$1,000.00 for the detention thereof.

COUNT TWO

The plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

The West 125 feet of the Southwest Quarter of the Southeast Quarter of the Southeast Quarter, Section 4, Township 6 South, Range 3 East, containing ten acres more or less.

to which said tract of land the plaintiff has the legal title, and upon which tract of land, before the commencement of this suit, the defendant entered and unlawfully withheld, together with \$1,000.00 for detention thereof.

GIBBONS & STOKES

FILED

DEC 8 1967

E. Graham Gibbons

E. Graham Gibbons
Attorney for the Plaintiff

ALICE J. DUCK CLERK
REGISTER

Since the plaintiff is a non-resident corporation, I
hereby hold myself liable for costs.

E. Graham Gibbons

E. Graham Gibbons
Attorney for the Plaintiff

Serve the defendants at: Route 1, Silverhill, Alabama

FILED

DEC 8 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7898

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CEDRIC MANICH & DORIS MANICH, a/k/a
CEDRIC J. MANNICH & DORIS M. MANNICH, Jointly & Individually

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 CEDRIC MANICH
& DORIS MANICH, a/k/a CEDRIC J. MANNICH & DORIS M. MANNICH, Jointly & Individually Defendant.....

by MED-STATE HOMES, INC., A Corporation
..... Plaintiff.....

Witness my hand this 8th day of December 19 67

Alice J. Hunt Clerk

24-1-8-68

S Hill

No. 7898

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MID-STATE HOMES, INC., A CORP.

Plaintiffs

vs.

CEDRIC MANICH & DORIS MANICH, a/k/a
CEDRIC J. MANNICH & DORIS J. MANNICH
Jointly & Individually
Defendants

SUMMONS AND COMPLAINT

Filed DEC. 8, 19 67

Alice J. Duck Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

DEC 8 1967

TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this *Jan 8* 19*68*

by leaving a copy with

Cedric Mannich
Doris Mannich

Sheriff's charge *120*

Ten Cents per mile Total *12.00*

TAYLOR WILKINS, Sheriff

Carlisle Chidrens
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Carlisle Chidrens Deputy Sheriff

S Hill