

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Millard R. King, Jessie M. King, Charles M. Moore and Anthony G. Moore to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of John H. Moore.

Witness my hand this 10 day of Sept., 1971.

Ernie B. Blackmon
Clerk


JOHN H. MOORE,	∅	IN THE CIRCUIT COURT OF
Plaintiff,	∅	BALDWIN COUNTY, ALABAMA
Vs.	∅	AT LAW
MILLARD R. KING, JESSIE M. KING, CHARLES M. MOORE and ANTHONY G. MOORE,	∅	NUMBER: <u>10,024</u>
Defendants.	∅	

Plaintiff claims of Defendants the sum of FIVE THOUSAND DOLLARS (\$5,000.00) for that heretofore on to-wit the 18th day of February, 1970 while Plaintiff was the owner of certain lands, in fee simple, in Baldwin County, Alabama described as follows:

The Southwest Quarter of the Southeast Quarter of the Northwest Quarter of Section 30, Township 7 South, Range 3 East in Baldwin County, Alabama

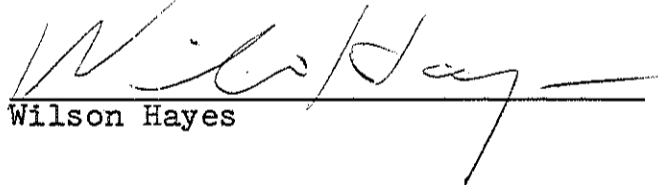
and that the said Millard R. King, Jessie M. King, Charles M. Moore or Anthony G. Moore owned no right, title or interest in the said land and that on the said date Defendants, Millard R. King and Jessie M. King, did execute a certain deed purporting to convey an undivided two-thirds interest in the said land above described to the said Charles M. Moore and Anthony G. Moore and that on to-wit February 23, 1970 Defendants, Charles M. Moore and Anthony G. Moore, did file the said deed for record in the Office of the Judge of Probate of Baldwin County, Alabama;

That the said deed was falsely and maliciously uttered, executed, made, published, filed and recorded; that Defendants, Millard R. King, Jessie M. King, Charles M. Moore and Anthony G. Moore, did well know that Millard R. King and Jessie M. King had no right, title or interest in the said property; that none of the said Defendants were then in possession of the same but that the said deed was executed, made, uttered and done, filed and recorded for and with the purpose of libeling the title of Plaintiff; that as a proximate consequence of the said acts of Defendants in making, executing, uttering, filing and recording the said deed that Plaintiff has been obliged to employ an Attorney, whereby to correct the cloud on his title made by the said deed; that Plaintiff has been put to great expense and anguish, worry and distress, that he has been made sick and ill by the said acts of Defendants, and Plaintiff claims punitive damages, hence this suit.



Attorney for Plaintiff
Wilson Hayes

Plaintiff demands trial by Jury.



Wilson Hayes

FILED

SEP 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

JOHN H. MOORE,)	
PLAINTIFF,)	IN THE CIRCUIT COURT OF
VS)	BALDWIN COUNTY, ALABAMA
MILLARD R. KING, ET AL.,)	AT LAW, <u>NO. 10,024</u>
DEFENDANTS)	

MOTION TO DISMISS

COMES NOW THE PLAINTIFF, IN THE ABOVE STYLED CAUSE, AND MOVES THAT THE COURT DISMISS THIS CAUSE HERETOFORE FILED BY HIM AS PLAINTIFF.

John H. Moore
JOHN H. MOORE

I, THE UNDERSIGNED, THE PLAINTIFF IN THE FOREGOING CAUSE, DO HEREBY CERTIFY THAT I HAVE CAUSED A COPY OF THE FOREGOING TO BE SERVED ON J. CONNOR OWENS, JR., THE ATTORNEY OF RECORD, BY PLACING THE SAME IN THE UNITED STATES MAIL, PROPERLY ADDRESSED WITH POSTAGE PREPAID, THIS 4th DAY OF APRIL, 1973.

John H. Moore
JOHN H. MOORE

FILED

APR 5 1973

EUNICE B. BLACKMON CIRCUIT CLERK