

LILLIAN BACH,

PLAINTIFF

VS

ROBERT. R. HAIRSTON AND LILLIAN
B. HAIRSTON,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

5183


Comes the Defendants for answer to the Complainants complaint,
and says as follows:

1. Not guilty.
2. The Defendants deny that the Plaintiff was in possession at the filing of this suit or at any other time.
3. The Defendants deny that they have entered unlawfully on said premises.
4. The Defendants deny that they have unlawfully withheld said premises.
5. The Defendants deny that they are indebted to the Plaintiff in the amount of \$200.00, or any other amount.

The Defendants alleged that they own a fee simple title in the lands described in compact by virtue of a Warranty Deed, dated September, 13, 1961, executed to them by W. F. Mandrell and Maude L. Mandrell, his wife, which deed is recorded in Deed Book 308, pages 466-67, Baldwin County records.

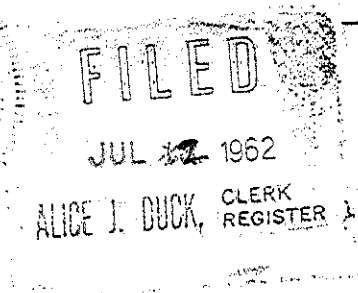
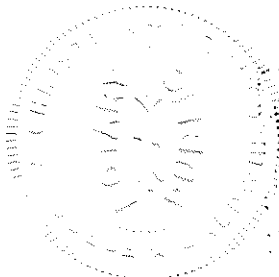

Forest A. Christian
Attorney for Defendants

I, Robert R. Hairston, one of the Defendants named in this suit, first being duly sworn, depose and say as follows: That the facts stated in the said answer are true and correct.


Robert R. Hairston

Sworn to and subscribed before me, a Notary Public, in and for Baldwin County, Alabama, this the 11th day of July, 1962.


Notary Public
Baldwin County, Alabama



LILLIAN BACH,

PLAINTIFF

VS

ROBERT R. HAIRSTON AND LILLIAN
B. HAIRSTON,

DEFENDANTS

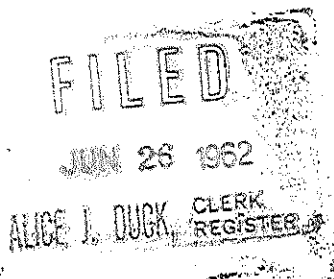
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff sues to recover possession of the following tract of land, lying and being in Baldwin County, Alabama, to-wit:

Beginning at a point on the West side of Lullwater Drive as shown on the map of Peterson's Point, recorded in Map Book 1 at Page 82, Baldwin County records, which point is due west from the Northwest corner of Lot 45 in Block 1 as shown by the said plat thence due West to a point, on the low water mark of Wolf or Wolf's Bay and following the meanderings thereof to a point where the half section line running East and West through the section intersects the water edge, then due East along the one-half section line to the West edge of Lullwater Drive as per plat above mentioned, thence in a Southerly direction along the West edge of Lullwater Drive to the point of beginning,

of which she was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with Two Hundred (\$200.00) Dollars for the detention thereof.


Attorney for Plaintiff



SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Robert R. Hairston and Lillian B. Hairston

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 Robert R. Hair-
ston and Lillian B. Hairston _____, Defendant _____

by Lillian Bach _____
_____, Plaintiff _____

Witness my hand this 26 day of June 1962

Eaf-7-6-12 W. J. French, Clerk

No. 5783

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Lillian Bach

Plaintiffs

vs.

Robert R. Hairston and

Lillian B. Hairston

Defendants

Summons and Complaint

Filed

FILED

19

JUN 26 1962

ALICE L. DUCK, CLERK

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Mifflin, Alabama

Received In Office

6/26, 1962

Sheriff.

I have executed this summons

this

by leaving a copy with

1962

Robert R. Hairston
Lillian B. Hairston

Sheriff claims

Ten Cents per mile Total

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

miles at

Sheriff.

Deputy Sheriff.