

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19_____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EARL BLACKWELL and OPAL BLACKWELL

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 EARL BLACKWELL and
OPAL BLACKWELL, Defendant^s

by CALLA MAI TANNER WATTS

Plaintiff

Witness my hand this 28 day of Aug 1961

Becky J. Black Clerk

No. 4841 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CALLA MAI TANNER WATTS

Plaintiffs

vs.

EARL BLACKWELL and

OPAL BLACKWELL

Defendants

SUMMONS and COMPLAINT

Filed **FILED**, 19____

AUG 28 1961

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

May be served at:
Defendant lives at
Gulf Fish Market, Foley, Ala.

RECEIVED IN OFFICE

Aug 27, 1961

Sheriff

I have executed this summons
this *Aug 28*, 19*61*

by leaving a copy with

Earl Blackwell
Opal Blackwell

Sheriff claims *14.4* miles at

Ten Cents per mile Total \$ *1.44*

TAYLOR WILKINS, Sheriff

BY

CC
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Foley

CALLA MAI TANNER WATTS

Plaintiff

-VS-

EARL BLACKWELL and OPAL BLACKWELL,

JOINTLY AND INDIVIDUALLY

Defendants

I

I

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

Plaintiff sues to recover possession of the following described tract of land:

From the Southeast Corner of the North Half ($N\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northeast Quarter ($NE\frac{1}{4}$) of the Northeast Quarter ($NE\frac{1}{4}$) of Section thirty-two (32) Township Seven (7) South, Range Four (4) East, run North 517.42 feet to the POINT OF BEGINNING; run thence West 208.71 feet; run thence South 108.71 feet 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 defendant entered and unlawfully withholds, together with ONE THOUSAND FOUR HUNDRED TWENTY SEVEN and 50/100 (\$1,427.50) DOLLARS of the detention thereof.


Attorney for Plaintiff

Defendant may be served at:

Gulf Fish Market,

Foley, Alabama

FILED

AUG 28 1961

ALICE L. DUCK, CLERK
REGISTER

CALLA MAI TANNER WATTS

Plaintiff

-VS-

EARL BLACKWELL and OPAL BLACKWELL,

JOINTLY AND INDIVIDUALLY

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Defendants in the above styled cause and demurs to
the Bill of Complainant heretofore filed and as grounds for demurrer
sets out the following:

1. The Complaint does not state a cause of action.

FILED

SEP 29 1961

ALICE L. DUCK, CLERK
REGISTER

Earl Blackwell

Opal Blackwell

Defendants