

4856

WILLIDGE RIDLY KING, Executor
of the Estate of NATHANIEL E.
KING, Deceased,

Plaintiff,

-vs-

GRACIE CARR, Otherwise known
as GRACE KING,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

COMPLAINT

COUNT I

The Plaintiff sues to recover possession of the following tract of land, to-wit:

In the Southwest Quarter (SW $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$) of Section Thirty (30), Township Six (6) South, Range Three (3) East; Beginning at a stake which is SIX HUNDRED SIXTY (660) feet East of the Southwest corner of the Northwest Quarter (NW $\frac{1}{4}$) of Section Thirty (30) and on the South line of said subdivision; thence East on the South line of the Northwest Quarter (NW $\frac{1}{4}$), TWO HUNDRED FORTY EIGHT (248) feet to a stake; thence North FIVE HUNDRED SEVENTY TWO (572) feet to a stake; thence West FOUR HUNDRED THIRTY SIX AND ONE HALF (436 $\frac{1}{2}$) feet to a stake; thence South FIVE HUNDRED SEVEN AND ONE HALF (507 $\frac{1}{2}$) feet to a stake; thence East ONE HUNDRED EIGHTY EIGHT (188) feet to a stake; thence South SIXTY SIX (66) feet to the Point of Beginning. Containing FIVE AND ONE HALF (5 $\frac{1}{2}$) acres. Variation used 4° 40' East.

-ALSO-

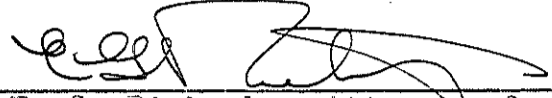
In the Southwest Quarter (SW $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$) of Section Thirty (30), Township Six (6) South, Range Three (3) East; Beginning at a point on the section line which is SIXTY SIX (66) feet North of the Southwest corner of the Southwest Quarter (SW $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$), thence North on the section line FIVE HUNDRED SEVEN AND ONE HALF (507 $\frac{1}{2}$) feet to a stake; thence East FOUR HUNDRED SEVENTY TWO (472) feet to a stake; thence South FIVE HUNDRED SEVEN AND ONE HALF (507 $\frac{1}{2}$) feet to a stake; thence West FOUR HUNDRED SEVENTY TWO (472) feet to the Point of Beginning. Containing FIVE AND FIVE TENTHS (5.5) acres. Variation used 4° 40' East.

-ALSO-

In the Southwest Quarter (SW $\frac{1}{4}$) of the Northwest Quarter (NW $\frac{1}{4}$) and the Northwest Quarter (NW $\frac{1}{4}$) of the Southwest Quarter (SW $\frac{1}{4}$) of Section Thirty (30), Township Six (6) South, Range Three (3) East; Beginning at a stake which is the Southwest corner of the Northwest Quarter (NW $\frac{1}{4}$), thence North on the section line SIXTY SIX (66) feet to a stake; thence East SIX HUNDRED SIXTY (660) feet to a stake; thence South SEVEN HUNDRED TWENTY SIX (726) feet to a stake; thence West SIX HUNDRED SIXTY (660) feet to a stake on the section line; thence North SIX HUNDRED SIXTY (660) feet to the Point of Beginning. Containing ELEVEN (11) acres. Variation used 4° 40' East. All of the above described property situated in Baldwin County, Alabama;

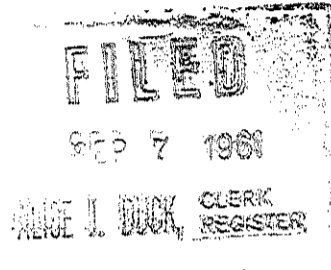
of which the deceased was in possession and upon which, pending such possession, and before the commencement of this suit, the

defendant entered and unlawfully withholds, together with ONE HUNDRED SEVENTY FIVE DOLLARS (\$175.00) for the detention thereof.



E. G. Rickarby, Attorney for
the Plaintiff.

Defendant can be located on the Clay City Road about one mile South of Fairhope Avenue in the City of Fairhope, Alabama.



E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

August 29, 1961

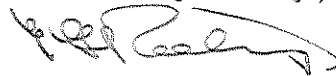
Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Willidge Ridly King, Executor
of the Estate of Mathaniel E.
King, Deceased
vs: Gracie Carr, Otherwise known as
Grace King

Enclosed find summons and complaint in the above
styled cause. Please process and oblige.

Yours very truly,



WR
Encl.
9/6/61

WILLIDGE RIDLY KING, Executor)
of the Estate of NATHANIEL E.)
KING, Deceased,)

Plaintiff,)

- vs -)

GRACIE CARR, Otherwise known)
as GRACE KING,)

Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

ANSWER TO COMPLAINT

Now comes the Defendant in this cause and for answer to complaint states that her name is Grace Carr King, and that she was married to the said Nathaniel E. King, deceased, as is shown by Marriage License dated June 15, 1940, recorded in Marriage License Book No. 6 (colored) page 423, which book and page shows that Nathan Elijah King was married to Grace Bell, whose address was Tuscaloosa; that the said defendant lived with the said Nathaniel E. King and nursed him during his last illness. There were no children born to said marriage and the Defendant, as the widow of said decedent, is entitled to all the personal property and a life estate in the lands described in said Complaint.

FILED
SEP 25 1961
ALICE I. DUCK, CLERK
REGISTER

Forest A. Christian, Jr.

Forest A. Christian, Attorney for
Defendant

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 GRACIE CARR, otherwise known as
GRACE KING

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
GRACIE CARR, Otherwise known as GRACE KING, Defendant.....

by WILLIDGE RIDLY KING, Executor of the Estate of NATHANIEL E. KING,
Deceased, Plaintiff.....

Witness my hand this 7 day of Sept 1961
Wesley H. Hester, Clerk
44-9-20-61

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

WILLIDGE RIDLY KING, Executor
of the Estate of NATHANIEL E.
KING, Deceased,

Plaintiffs

vs.

GRACIE CARR, Otherwise known as
GRACE KING,

Defendants

Summons and Complaint

FILED

Filed _____ 19____

SEP 7 1961

ALICE J. DUCK, CLERK
REGISTER Clerk

E. G. Rickarby
Attorney at Law
P. O. Box 71
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

On the Clay City Road about
one mile South of Fairhope
Avenue, Fairhope, Alabama.

Received In Office

9/7, 1961

Sheriff.

I have executed this summons

this Sept 20 1961

by leaving a copy with

Gracie Carr (Alias)
Grace King

Sheriff claims .86 miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

BY W. C. Garner
DEPUTY SHERIFF

Joyles Wilkins Sheriff.
W. C. Garner Deputy Sheriff.

89mi So East of hope