

ALABAMA MORTGAGE LOANS,
INCORPORATED, a corporation,

Plaintiff,

VS:

JOSEPH ENGLISH and
JESSIE LEE ENGLISH,
individually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4980

COUNT ONE

Plaintiff sues to recover possession of the following real property
situate, lying and being in Baldwin County, Alabama, described as follows,
viz:

Lot Numbered One Hundred Nineteen (119) in Bay Ridge
Subdivision of part of D'Olive Grant, Section 7, Township
5 South, Range 2 East as per plat recorded in Map Book
Four (4), Page One Hundred Thirteen (113), Baldwin County
Probate Records-with the improvements thereon.

to the immediate possession of which the Plaintiff is entitled by virtue of the
purchase of said land at a sale of the same on a foreclosure of a mortgage and
which the Defendants, after the termination of their possessory interest and
after the Plaintiff's demand in writing therefor, unlawfully detain, together
with, to-wit, \$300.00 for the detention thereof. The Plaintiff claims the right
to have this case set and tried as a preferred case under the laws governing
such matters.

J. Terry Reynolds, Jr.
Wm. R. Lauten
Attorneys for Plaintiff

Defendants' may be served at:

Route 1, Box 276
Daphne, Alabama

This house is located in Bay Ridge Subdivision.

Turn to the left off of the paved highway onto
a dirt road and go about one-half mile. The
telephone number is WA-85156.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4980

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOSEPH ENGLISH, and JESSIE LEE ENGLISH,

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 JOSEPH ENGLISH
and JESSIE LEE ENGLISH, as Ind. & Jointly, Defendant.

by ALABAMA MORTGAGE LOANS, INC., A CORP

Plaintiff

Witness my hand this 22 day of Dec., 1961

Alice J. Luck, Clerk

No. _____

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALABAMA MORTGAGE LOANS, INC A CORP

Plaintiffs

vs.

JOSEPH ENGLISH & JESSIE LEE
ENGLISH

Defendants

SUMMONS and COMPLAINT

Filed _____, 19____

..., Clerk

COPY FOR:
JOSEPH ENGLISH
6203 E. Warringwood Dr.

RTO

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

19

Sheriff

I have executed this summons

this _____, 19

by leaving a copy with

Sheriff

Deputy Sheriff

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

January 23, 1962

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

Re: Alabama Mortgage Loans, Inc. - Plaintiff
VS: Joseph English and Jessie Lee English - Defendants
Case No. 4980
Baldwin County, Alabama, At Law

Dear Mrs. Duck:

I just located both of the Defendant in this case. You advised me recently that the Defendants were not found. I found they they have moved to Mobile and this was the reason. Please issue an alias summons and complaint to both of the defendants immediately and have the papers sent to the Sheriff of Mobile County, Alabama for service. The Defendants are now living at 6203 East Warringwood Drive, Hillsdale Heights, Mobile, Alabama and Joseph English is working for Baggett Transportation Co. 1919 Telegraph Road, Mobile, Alabama. I would appreciate it if you will send a copy of this letter enclosed to Sheriff Bridges or direct it to the Attention of Mr. Bellman, his chief clerk so that they may serve the Defendants.

Very truly yours,

J. Terry Reynolds
J. Terry Reynolds, Jr.

JTR:jp

Dictated but not checked

ALABAMA MORTGAGE LOANS,
INCORPORATED, a corporation,

Plaintiff,

VS:

JOSEPH ENGLISH and
JESSIE LEE ENGLISH,
individually and jointly,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

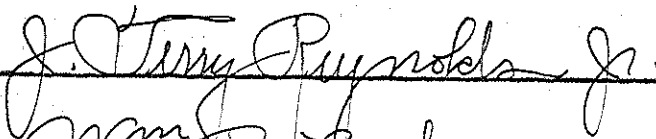
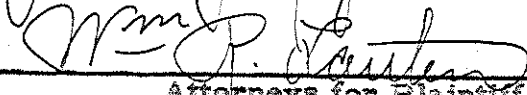
CASE NO. _____

COUNT ONE

Plaintiff sues to recover possession of the following real property
situate, lying and being in Baldwin County, Alabama, described as follows,
viz:

Lot Numbered One Hundred Nineteen (119) in Bay Ridge
Subdivision of part of D'Olive Grant, Section 7, Township
5 South, Range 2 East as per plat recorded in Map Book
Four (4), Page One Hundred Thirteen (113), Baldwin County
Probate Records-with the improvements thereon.

to the immediate possession of which the Plaintiff is entitled by virtue of the
purchase of said land at a sale of the same on a foreclosure of a mortgage and
which the Defendants, after the termination of their possessory interest and
after the Plaintiff's demand in writing therefor, unlawfully detain, together
with, to-wit, \$300.00 for the detention thereof. The Plaintiff claims the right
to have this case set and tried as a preferred case under the laws governing
such matters.



Attorneys for Plaintiff

Defendants' may be served at:

Route 1, Box 276

Daphne, Alabama

This house is located in Bay Ridge Subdivision.

Turn to the left off of the paved highway onto
a dirt road and go about one-half mile. The
telephone number is WA-85156.

SUMMONS AND COMPLAINT

CIRCUIT COURT, BALDWIN COUNTY

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 4980

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOSEPH ENGLISH, and JESSIE LEE ENGLISH,

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 JOSEPH ENGLISH

and JESSIE LEE ENGLISH, in Ind. & Jointly, Defendant

by ALABAMA MORTGAGE LOANS, INC., A CORP, Plaintiff

Witness my hand this 22 day of Dec., 19 61

Alice J. Duck, Clerk

No. mer Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALABAMA MORTGAGE LOANS, INC. A CORP

Plaintiffs

vs.

JOSEPH ENGLISH & JESSIE LEE

ENGLISH

Defendants

SUMMONS and COMPLAINT

Filed _____, 19_____

_____, Clerk

COPY FOR:
JESSIE LEE ENGLISH
6203 E. Warringwood

BTD

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19_____

, Sheriff

I have executed this summons

this _____, 19_____

by leaving a copy with

Sheriff

Deputy Sheriff

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

January 23, 1962

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

Re: Alabama Mortgage Loans, Inc. -Plaintiff
VS: Joseph English and Jessie Lee English-Defendants
Case No. 4980
Baldwin County, Alabama, at law

Dear Mrs. Duck:

I just located both of the defendants in this case. You advised me recently that the defendants were not found. I found that they have moved to Mobile and this was the reason. Please issue an alias summons and complaint to both of the defendants immediately and have the papers sent to the Sheriff of Mobile, County, Alabama for service. The defendants are now living at 6203 East Warringwood Drive, Hillsdale Heights, Mobile, Alabama and Joseph English is working for Baggett Transportation Company, 1919 Telegraph Road, Mobile, Alabama. I would appreciate it if you will send a copy of this letter enclosed to Sheriff Bridges or direct it to the attention of Mr. Bellman, his chief clerk so that they may serve the defendants

Very truly yours,

J. Terry Reynolds
J. Terry Reynolds, Jr.

JTR:jp

Dictated but not checked

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

December 19, 1961

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


Re: Alabama Mortgage Loans, Inc. -Plaintiff
Vs: Joseph English and Jessie Lee English-Defendants

Dear Mrs. Duck:

It will be appreciated if you will file this suit for me immediately. The Defendants have been in default on the mortgage for many months and have promised the purchaser, Alabama Mortgage Loans, Inc., through me as their attorney that they would do something about the mortgage a number of times. I ask you to please note the last sentence in the complaint as this case is entitled to a preference under the law as to the setting of such matters; viz: the earliest possible setting.

I will thank you most kindly to advise me upon receiving the sheriff's return when the Defendants have been served, so that I may watch the matter for the Defendants' thirty day appearance. Your usual prompt attention will be most sincerely appreciated and I thank you personally.

Warmest personal regards.


J. Terry Reynolds, Jr.

JTR:jp
Dictated but not checked

ALABAMA MORTGAGE LOANS,
INCORPORATED, a corporation,

Plaintiff,

VS:

JOSEPH ENGLISH and
JESSIE LEE ENGLISH,
Individually and jointly,

Defendants.

0 IN THE CIRCUIT COURT OF
0
0 BALDWIN COUNTY, ALABAMA

0
0 AT LAW

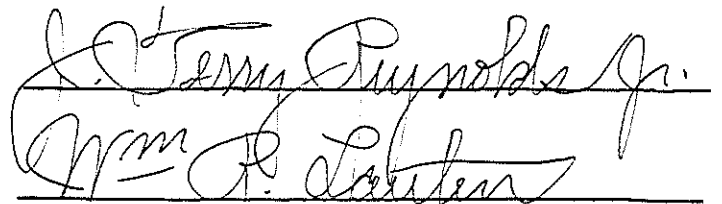
0
0 CASE NO. 4980
0
0

COUNT ONE

Plaintiff sues to recover possession of the following real property
situate, lying and being in Baldwin County, Alabama, described as follows,
viz:

Lot Numbered One Hundred Nineteen (119) in Bay Ridge
Subdivision of part of D'Olive Grant, Section 7, Township
5 South, Range 2 East as per plat recorded in Map Book
Four (4), Page One Hundred Thirteen (113), Baldwin County
Probate Records-with the improvements thereon.

to the immediate possession of which the Plaintiff is entitled by virtue of the
purchase of said land at a sale of the same on a foreclosure of a mortgage and
which the Defendants, after the termination of their possessory interest and
after the Plaintiff's demand in writing therefor, unlawfully detain , together
with, to-wit, \$300.00 for the detention thereof. The Plaintiff claims the right
to have this case set and tried as a preferred case under the laws governing
such matters.


Attorneys for Plaintiff

Defendants' may be served at:

Route 1, Box 276
Daphne, Alabama

This house is located in Bay Ridge Subdivision.
Turn to the left off of the paved highway onto
a dirt road and go about one-half mile. The
telephone number is WA-85156.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4980

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOSEPH ENGLISH, and JESSIE LEE ENGLISH,

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 JOSEPH ENGLISH
and JESSIE LEE ENGLISH, ~~xx~~ Ind. & Jointly, Defendant.

by ALABAMA MORTGAGE LOANS, INC., A XCORP

Plaintiff.

Witness my hand this 22 day of Dec., 1961

Not Served -

Alice J. Sisk

Clerk

No. 4980

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALABAMA MORTGAGE LOANS,

Inc, a Corp.

Plaintiffs

vs.

JOSEPH ENGLISH & JESSIE LEE ENGLISH

Daphne

Defendants

SUMMONS and COMPLAINT

Filed Dec. 22, 19 61

Alice J. Duck

, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

12/22, 19 61

, Sheriff

I have executed this summons

this , 19

by leaving a copy with

Returned 14 day of Jan 19 62
not found in my county after diligent search and Inquiry.

Taylor Wilkins, Sheriff

By W. O. Barnes
Deputy Sheriff

Moved to Mobile

Sheriff

Deputy Sheriff

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

Joseph English and Jessie Lee English

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 _____

Joseph English and Jessie Lee English, Defendant.

by **Alabama Mortgage Loans, Inc. A Corp**

_____, Plaintiff.

Witness my hand this 27th day of Dec 1961

Alvin J. Smith Clerk

No. 4980 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALABAMA MORTGAGE LOANS, INC. A CORP

Plaintiffs

vs.

JOSEPH ENGLISH & JESSIE LEE ENGLISH

Defendants

SUMMONS and COMPLAINT

Filed 12-22-, 1961

Alice J. Duck, Clerk

RECEIVED

JAN 26 1962

SHERIFF'S OFFICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

*6203 East Warrington
Dr. Milledale Heights
Baptist Church - 1418 1/2
RECEIVED IN OFFICE*

Jan. 24, 1962

Sheriff

I have executed this summons

this _____, 19____

by leaving a copy with

Returned 1-30-62

Without Action By Order of *Atty*

RAY D. BRIDGES, Sheriff

Ray D. Bridges

Sheriff

Deputy Sheriff

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

February 26, 1962

Mrs. Alice J. Duck
Clerk
Circuit Court
Bay Minette, Alabama

Re: Alabama Mortgage Loans, Inc.
Vs: Joseph and Jessie Lee English
Case No. 4980
Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

It will be most sincerely appreciated if you would ask the
Judge to dismiss this case at the request of the Plaintiff and
send me a cost bill for which I will send you a check.

Warmest personal regards,


J. Terry Reynolds, Jr.

JTR:jp
Dictated but not checked