ALABAMA MORTGAGE LOANS, INCORPORATED, a corporation,

Plaintiff,

VS:

JOSEPH ENGLISH and JESSIE LEE ENGLISH, individually and jointly,

Defendants.

IN THE CIRCUIT COURT OFBALDWIN COUNTY, ALABAMA

2000 2

AT LAW

CASE NO.

### COUNT ONE

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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.

LAW OFFICES
J. Terry Reynolds, Jr.
AND
William R. Lauten
1ST NAT'L BANK BLDG.
MOBILE, ALA.

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## THE STATE OF ALABAMA,

BALDWIN COUNTY

		CIRCUIT	COURT,	BALDWIN	COUNT
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LAW OFFICES OF

J. TERRY REYNOLDS. JR.

AND

WILLIAM R. LAUTEN

ATTORNEYS AT LAW

605-6 FIRST NATIONAL BANK BUILDING

MOBILE. ALABAMA

January 23, 1962

HEMLOCK 3-3661

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, Jr.

JTR:jp

Dictated but not cheded

ALABAMA MORTGAGE LOANS, IN THE CIRCUIT COURT OF INCORPORATED, a corporation.

Plaintiff,

VS:

JOSEPH ENGLISH and JESSIE LEE ENGLISH, individually and jointly,

Defendants.

#### COUNT ONE

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

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Attorneys for Plaintiff

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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.

LAW OFFICES

J. Terry Reynolds, Jr.
AND

William R. Lauten
1ST NAT'L BANK BLDG.
MOBILE, ALA.

THE	STATE	OF	ALABAMA,
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BALDWIN COUNTY

No. 4980 TERM, 19

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	Plaintiff's A	torney

Defendant's Attorney

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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,

Terry Revnolds, Jr.

JTR: ip

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, 0 IN THE CIRCUIT COURT OF INCORPORATED, a corporation, 0 BALDWIN COUNTY, ALABAMA Plaintiff, 0 AT LAW

VS: 0

JOSEPH ENGLISH and 0
JESSIE LEE ENGLISH, 0 CASE NO. 4980
Individually and jointly, 0

Defendants. 0

#### COUNT ONE

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LAW OFFICES

J. Terry Reynolds, Jr.

AND

William R. Lauten

IST NAT'L BANK BLDG.

MOBILE, ALA.

## THE STATE OF ALABAMA,

BALDWIN COUNTY

	CIRCUIT	COURT,	BALDWIN	COUNTY
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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