

CHARLIE KYLE,

Plaintiff,

Vs.

IDA BELLE KYLE,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

11990

The Plaintiff sues to recover possession of the following tract of land: From the Northwest corner of Section 20, Township 5 South, Range 2 East, run East 1906 feet for the point of beginning; thence run South  $01^{\circ}$  West 237', South  $85^{\circ} 45'$  East 75', North  $01^{\circ}$  East 245' West 74' to beginning; being a portion of the land described in deed recorded in Deed Book 103, page 440, of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with (\$100.00) ONE HUNDRED DOLLARS for the detention thereof.

WILTERS & BRANTLEY

BY:

*Robert M Brantley*  
Attorney for the Plaintiff

FILED  
JAN 10 1962  
ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4990

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon IDA BELLE KYLE

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

IDA BELLE KYLE

Defendant

by CHARLIE KYLE

Plaintiff

Witness my hand this 10th day of January 19 62

*Alice J. Luck*, Clerk

No. 4990

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

CHARLIE KYLE

Plaintiffs

vs.

IDA BELLE KYLE

Defendants

SUMMONS and COMPLAINT

Filed Jan. 10, 1962

Alice J. Duck, Clerk

WILTERS & BRANTLEY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

1/11, 1962

, Sheriff

I have executed this summons

this Jan 13, 1962  
by leaving a copy with

Ida Belle Kyle

Sheriff claims 54 miles at  
Ten Cents per mile Total \$ 5.40  
TAYLOR WILKINS Sheriff  
BY Daphne  
DEPUTY SHERIFF

Taylor Wilkins Sheriff  
W.O. Garner Deputy Sheriff  
Daphne

CHARLIE KYLE,  
Plaintiff,  
Vs.  
IDA BELLE KYLE,  
Defendant.

X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 4990

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to deliver to Charlie Kyle possession of the lands and tenaments which the said Charlie Kyle recovered of Ida Belle Kyle by judgment of the Circuit Court held for the County of Baldwin on the 16 day of February, 1962, to-wit:

From the Northwest corner of Section 20, Township 5 South, Range 2 East, run East 1906 feet for the point of beginning; thence run South  $01^{\circ}$  West 237', South  $85^{\circ} 45'$  East 75', North  $01^{\circ}$  East 245' West 74' to beginning; being a portion of the land described in deed recorded in Deed Book 103, page 440, of which he was in possession.

You are further commanded of the goods and chattels, lands and tenaments of said Ida Belle Kyle to be made the sum of \$ 31.00, cost of suit; and make return of this Writ and the execution thereof, according to law.

Witness my hand this the 8 day of March, 1962.

Alvin J. Duncanson  
Clerk

EA-3-10-62

Executed by delivering the  
within described property  
to Charlie Kyle June 2, 1962

Taylor Wilkins Sheriff  
W.O. Garner chief deputy

Sheriff claims 57 miles at  
Ten Cents per mile Total \$ 5.70  
TAYLOR WILKINS, Sheriff  
BY Garner  
DEPUTY SHERIFF

Received 10 day of March 1962  
and on 10 day of March 1962  
I served a copy of the within  
on Ida Belle Kyle  
By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
BY W.O. Garner  
Garner

(copy)

no. 4990

Charlie Kyle

Ida Belle Kyle

**E. G. RICKARBY**

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

January 2, 1962

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

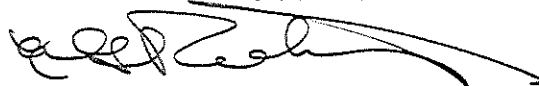
Dear Mrs. Duck:

Re: W. J. Eldering & Son W.V., a  
corporation -vs- John G.  
Evans, Individually & d/b/a  
John G. Evans Farms

Enclosed find summons and complaint in the above  
styled cause, together with itemized and verified  
statement of account, <sup>copy of</sup> order made by Mr. Evans and  
my check in the sum of \$25.00 representing court  
costs.

Please process and oblige.

Yours very truly,



WR  
Enclosures  
cc (dup.) Client

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

June 26, 1962

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

Dear Mrs. Duck:

Re: W. J. Eldering & Son N.V., A Corporation  
Vs: John Evans Farms  
Our File #5631 Case #4985

Enclosed find Amended Complaint in the above styled  
cause, copy of which is being sent to Mr. Norborne  
Stone.

Yours very truly,



EGR/wrt

Encl.

cc: Mr. Norborne Stone

CHARLIE KYLE, I  
Plaintiff, I IN THE CIRCUIT COURT OF  
Vs. I BALDWIN COUNTY, ALABAMA  
IDA BELLE KYLE, I AT LAW  
Defendant. I CASE NO. \_\_\_\_\_

WRIT OF POSSESSION

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF SAID STATE:

You are hereby commanded to deliver to Charlie Kyle possession of the lands and tennements which the said Charlie Kyle recovered from Ida Belle Kyle by the Judgment of the Circuit Court of Baldwin County, Alabama, rendered on the 16 day of February, 1962, to-wit: From the Northwest corner of Section 20, Township 5 South, Range 2 East, run East 1906 feet for the point of beginning; thence run South  $01^{\circ}$  West 237', South  $85^{\circ} 45'$  East 75', North  $01^{\circ}$  East 245' West 74' to beginning; being a portion of the land described in deed recorded in Deed Book 103, page 440; You are further commanded of the goods, chattel, lands and tennements of Ida Belle Kyle you cause to be made the sum of \$ 31.80, cost of this suit and make return of this Writ and execution according to law.

Witness my hand this the 26 day of February, 1962.


Alice J. Duck  
Alice J. Duck, Clerk of the Circuit  
Court, Baldwin County, Alabama



CHARLIE KYLE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
IDA BELLE KYLE,	X	AT LAW
Defendant.	X	CASE NO. _____

This day came Charlie Kyle, personally and by his Attorney, and the Defendant, being called, came not but made default; and on motion of the Plaintiff, after hearing the evidence, and it being proved to the satisfaction of the Court that the Defendant was in possession of the property sued for at the commencement of this suit, the Court being of the opinion that the Plaintiff is entitled to the relief he seeks, it is, therefore, ORDERED, ADJUDGED and DECREED that Judgment, and it is hereby made in favor of the Plaintiff and against the Defendant, for the possession of the property described in the Complaint: From the Northwest corner of Section 20, Township 5 South, Range 2 East, run East 1906 feet for the point of beginning; thence run South 01° West 237', South 85° 45' East 75', North 01° East 245' West 74' to beginning; being a portion of the land described in deed recorded in Deed Book 103, page 440. It is further ORDERED, ADJUDGED and DECREED by the Court that the Plaintiff have and recover of the Defendant the property sued for and described in the Complaint, together with the cost in this behalf expended, and for all of which let a Writ of Possession and execution issue.

Done this the 16 day of February, 1962.

  
 Hubert M. Hall, Circuit Judge of the  
 28th Judicial Circuit Court.