

R. A. Norred

ATTORNEY

209 CLARK BUILDING
1926 - 4TH AVE. NORTH
BIRMINGHAM 3, ALABAMA
TELEPHONE
322-2351

December 20, 1963

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

Re: Mid-State Homes, Inc., v. Jimmie Atchison,
Jr. and Pauline Atchison; Case No. 5736

Dear Mrs. Duck:

It has become unnecessary to proceed further
in the above case, and I therefore enclose herein a
Motion of Dismissal.

I would appreciate it if you would have this
cause dismissed at your earliest convenience, and for-
ward to me a cost bill therein.

Yours, very truly,

R. A. Norred
R. A. NORRED

RAN/ss
Enc.: 1

/ss

R. A. NORRED
ATTORNEY

209 CLARK BUILDING
1926 4TH AVE. NORTH
BIRMINGHAM 3, ALABAMA

October 2, 1963

Clerk, Circuit Court of
Baldwin County
Bay Minette, Alabama

Re: Mid-State Homes, Inc., Plaintiff
-vs-
Jimmie Atchison, Jr. and Pauline
Atchison, Defendants

Dear Sir:

I enclose herewith an original and two copies of a
Summons and Complaint for filing and service in
the above. The Defendants' address is Route 1, Box
290, Bay Minette, Alabama.

I would appreciate it very much if you would acknow-
ledge receipt hereof, confirming the filing date, and
if you would also advise when service has been perfected
on the Defendants.

Yours very truly,



R. A. Norred

RAN:ccs
Enclosures

MID-STATE HOMES, INC.,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
vs.)	AT LAW.
)	
JIMMIE ATCHISON, JR. and)	
PAULINE ATCHISON,)	CASE NO. 5736
)	
Defendants.)	

MOTION OF DISMISSAL

Comes the Plaintiff in the above styled cause and
moves that said cause be dismissed at the cost of the Plaintiff.

271

R. A. NORRED, Attorney for Plaintiff
209 Clark Building
Birmingham, Alabama
Telephone - 322-2351.

SUMMONS

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jimmy Atchison, Jr. and Pauline Atchison to appear within thirty days from the date of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Mid-State Homes, Inc.

Witness my hand this 14 day of Oct, 1963.

Eric F. Neuck
CLERK

MID-STATE HOMES, INC.,) IN THE CIRCUIT COURT OF
)
Plaintiff) BALDWIN COUNTY, ALABAMA
)
vs.)
)
JIMMIE ATCHISON, JR. and)
)
PAULINE ATCHISON,)
)
Defendants)

COMPLAINT

COUNT ONE: The Plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama:


Commence at the half section post of the line dividing Section 28 and 33, run thence West Seven and 7/100 chains to a point, thence North 210 to a point of beginning, thence continue North 105 feet to a point, thence West 210 feet to a point, thence run South 105 feet to a point, thence East 210 feet to the point of beginning, containing one-half acre, more or less, being situated in Sub-division "D" of Fractional Section 28, in Township 2 South, Range 2 East,

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.

COUNT TWO: The Plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

(The Plaintiff incorporates herein as if fully and completely set out at length herein, by reference and adoption, the full legal description of the real estate set out and described in Count One of this Complaint,)

to which said tract of land the Plaintiff has the legal title, and upon which tract of land, before the commencement of this suit, the Defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.



R. A. NORRED
Attorney for Plaintiff
209 Clark Building
Birmingham, Alabama
Telephone 322-2351

FILED

OCT 4 1963

ALICE L. DUCK,

CLERK
REGISTER

EX-11-12-63

Rt 1

Bay 390

B. M.

ived 4 day of Oct 1963

on 12 day of Nov 1963

ved a copy of the within

Pauline St. James
Atchison

vice on

TAYLOR WILKINS
By W. A. Zolbert

Hurricane

40

20

4.00

Sheriff claims

Ten Cents per mile

TAYLOR WILKINS
BY W. A. Zolbert
DEPUTY SHERIFF

NO. 5736

Mich. State Homes

OS

Jimmie Stenson
and
Pauline Stenson

Telephone 638-2021
Stinson, Mich.
500 Otter Building
Stinson, Mich.
Telephone 638-2021

FILED

OCT 22

W. L. DICK, CLERK
REGISTER