

GREATER NEW YORK SAVINGS BANK,
A New York Banking Corporation,

Plaintiff,

vs.

OLLIE JAMES and LUCILLE JAMES,

Defendants.

I
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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5986

The Plaintiff sues to recover possession of the following tract of land situated in Baldwin County, Alabama, to-wit:

From the Southwest corner of Section 16, Township 2 South, Range 3 East, run North 299.5 feet to a concrete block marker; thence run South 85° 34' East 213.2 feet to a concrete block marker; thence run North 1° 2' East 250 feet to the point of beginning of the property herein described; thence North 1° 2' East 50 feet to a point; thence run West 213.2 feet to a point on a fence line; thence run South 50 feet to a point; thence run East 213.2 feet, more or less, to the point of beginning; together with the hereditaments and appurtenances thereunto belonging,, and also together with all equipment and fixtures for heating and lighting installed therein.

of which it was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with Eighty and no/100 Dollars (\$80.00) for the detention thereof.

FILED

MAR 28 1964

AUDIE J. DUCK, CLERK
REGISTER

MASHBURN AND OWENS

By: J. J. Mashburn

Attorneys for the Plaintiff.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

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 OLLIE JAMES and LUCILLE JAMES

DOUGLASVILLE

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-----

GREATER NEW YORK SAVINGS BANK, a New York Banking Corporation, Defendant-----

by-----

-----, Plaintiff-----

Witness my hand this 23 day of March 19 64

EX-3-23-64

Alice D. Duck, Clerk

No. 5986

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The State of Alabama

Baldwin County

CIRCUIT COURT

GREATER NEW YORK SAVINGS

BANK, a New York Banking
Corporation, Plaintiffs

vs.

OLLIE JAMES AND LUCILLE

JAMES,

Memphis, Tenn. Defendants

Summons and Complaint

Filed _____ 19 _____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

3/23 1964

_____, Sheriff

I have executed this summons

this March 23 1964

by leaving a copy with

Ollie James
Lucille James

Sheriff claims 8 miles at

Ten Cents per mile Total 80¢

TAYLOR WILKINS, Sheriff

BY T. Wilkins
DEPUTY SHERIFF

Taylor Wilkins Sheriff

R. A. Zeller Deputy Sheriff

D. Vell

GREATER NEW YORK SAVINGS BANK, X
A New York Banking Corporation, X

Plaintiff X

vs X

OLLIE JAMES and LUCILLE JAMES X

Defendants X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO 3986

-1-

Come the defendants in the above styled cause by their attorney and disclaim any right, title, interest or claim in and to the lands sued for in this action except the right of redemption as the mortgagors following foreclosure.

-2-

That said defendants were foreclosed under a mortgage payable by said defendants to the said plaintiff and said defendants have removed themselves and their possessions from the lands, subject of this action.

THOMPSON & WHITE

BY: 

Attorneys for defendants.

FILED

APR 6 1964

ALICE J. DUCK, CLERK
REGISTER

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