

*R. A. Norred*  
ATTORNEY

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

July 29, 1964

Clerk of the Circuit Court  
Baldwin County  
Bay Minette, Alabama

Re: Mid-State Homes, Inc.  
vs: Haywood Huffman, et ux

Dear Sir:

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

I would appreciate it very much if you would acknowledge 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/jd

Enclosures

MID-STATE HOMES, INCORPORATED,  
a corporation,

Plaintiff,

Vs.

HAYWOOD HUFFMAN, and wife,  
ESSIE HUFFMAN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

Case No. 6132

DEMURRER

Comes now the Defendants, Haywood Huffman, in above styled cause, by his attorney, and demurs to the complaint heretofore filed in this cause, and to each and every count thereof, separately and severally, and says:

1. The complaint does not state a cause of action.
2. The complaint is vague and uncertain.
3. There is no allegation that the defendants unlawfully entered the premises alleged to be withheld from the plaintiff.
4. There is no allegation that the defendants forcibly entered the premises described in the bill of complaint.
5. The complaint does not allege that the plaintiff is owner of the parcel of land described.
6. The complaint does not allege how nor when the plaintiff gained possession of the described parcel of real property.
7. The complaint does not allege when the alleged unlawful detention began.

  
Attorney for Defendants  
Haywood Huffman

Attorney Of Record For Plaintiff:

Hon R. A. Norred  
209 Clark Building  
Birmingham 3, Alabama

FILED

Aug. 31 1964

ALICE L. DUCK, CLERK  
REGISTER

MID -STATE HOMES, INCORPORATED,  
a corporation,

Plaintiff,

vs.

HAYWOOD HUFFMAN, and wife,  
ESSIE HUFFMAN,  
Defendants.

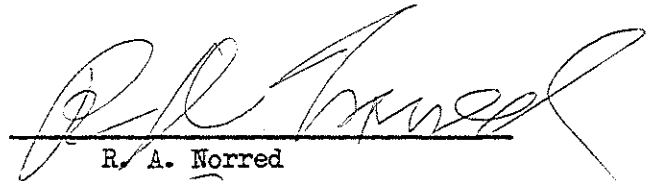
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW  
NO. 6132

JOINT MOTION OF DISMISSAL

Comes the plaintiff and the defendants, through their respective attorneys of record, and jointly move that this cause be dismissed and that the costs be taxed against the plaintiff.



R. A. Norred  
Attorney for the Plaintiff



Kenneth Cooper  
Attorney for the Defendants

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Haywood Huffman and Essie Huffman 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 same, then and there to answer the complaint of Mid-State Homes, Incorporated.

Witness my hand this 30 day of July, 1964.

Rebecca J. Luck  
Clerk

MID-STATE HOMES, INCORPORATED, )  
a corporation, )

Plaintiff, )

vs. )

HAYWOOD HUFFMAN, and wife, )  
ESSIE HUFFMAN, )

Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

CASE NO. 6132

COMPLAINT

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


A lot of land 90' Sq. lying at the NW cor. of the following described parcel of land: Being in the SE $\frac{1}{4}$  of the SW $\frac{1}{4}$  of Sect. 17, T2S, R3E viz: Commencing at the SE cor. of the SW $\frac{1}{4}$  of said Sect. 17, thence W. along the S. boundary of said Sect. 158' to a point, thence No. 52 degs. 15' W. 427.7' to a point, thence No. 37 degs. 45' E. 140' to a point being the POB. Thence cont. No. 37 degs. 45' E. 208.7' to a point, thence No. 52 degs. 15' W. 208.7' to a point, thence So. 37 degs. 45' W. 208.7' to a point, thence So. 52 degs. 15' E. 208.7' to the POB. Containing 1 acre, it being the intention of this deed to convey a lot of land in the NW cor. of this land, same being 90' square.

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. NORRES, Attorney for Plaintiff  
209 Clark Building  
Birmingham 3, Alabama  
Telephone: 322-2351

E4-8-17-64

FILED

JUL 30 1964

ALICE L. DUCK, CLERK  
REGISTER

No. 6132

Received 30 day of July 1944  
and on 17 day of Aug 1944  
served a copy of the within to J.C.H.  
in Haywood Huffman  
Essie Huffman  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W.A. Talbert D.S.  
D. Will

Sheriff claims 8 miles

Ten Cents per mile Total \$ 80¢  
TAYLOR WILKINS, Sheriff

BY Talbert  
DEPUTY SHERIFF

Midstate Homes  
Inc - a corp

DS

Haywood Huffman  
and wife

Essie Huffman

FILED

JUL 30 1964

ALICE L. DICK, CLERK  
REGISTER

address:  
Ray, Minnetta, Minn.