

GIBBONS & STOKES

ATTORNEYS AT LAW

308-309 VAN ANTWERP BUILDING

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

July 30, 1964

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA, 36601

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

6134

Re: Jim Walter Corporation vs. Katie Lee Thomas

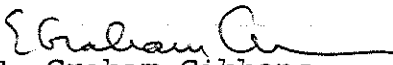
Dear Mrs. Duck:

I enclose herein an original and two copies of a complaint in ejectment in the above case. I would appreciate it if you would file the same in the Circuit Court of Baldwin County and issue it for service, and I would also appreciate it if you would confirm the filing date and also the date when service is perfected.

The defendant's address is Route #1, Box 139, Daphne, Alabama.

Thank you very much for your attention to this matter.

Sincerely yours,

  
E. Graham Gibbons

EGG:m  
Encl

JIM WALTER CORPORATION,	)	IN THE CIRCUIT COURT OF
a corporation,	)	BALDWIN COUNTY,
Plaintiff	)	ALABAMA
VS:	)	AT LAW
KATIE LEE THOMAS,	)	
Defendant	)	CASE NO. _____

COUNT ONE

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

From the Southeast Corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet, for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the said East boundary of said section, 388.4 feet, more or less, to a point on the North boundary of the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of said section 28, thence run East along said North boundary of S $\frac{1}{2}$  of SE $\frac{1}{4}$  of SE $\frac{1}{4}$ , 336.4 feet to a point on the East boundary of said Section 28; thence run South along the section line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of Section 28, T4S, R2E, Baldwin County, Alabama.

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

COUNT TWO

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

From the Southeast Corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet, for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the said East boundary of said section, 388.4 feet more or less, to a point on the North boundary of the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of said Section 28, thence run East along said North boundary of S $\frac{1}{2}$  of SE $\frac{1}{4}$  of SE $\frac{1}{4}$ , 336.4 feet to a point on the East boundary of said Section 28; thence run South along the Section line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of Section 28, T4S, R2E, Baldwin County, Alabama.

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 defendant entered and unlawfully withhold,  
together with \$1,000.00 for detention thereof.

GIBBONS & STOKES

BY: E. Graham Gibbons  
E. GRAHAM GIBBONS  
Attorney for Plaintiff

Serve the defendant at Route #1, Box 139, Daphne, Alabama.

JIM WALTER CORPORATION,        )   IN THE CIRCUIT COURT OF  
a corporation,                    )   BALDWIN COUNTY,  
Plaintiff                         )   ALABAMA  
VS:                                 )   AT LAW  
KATIE LEE THOMAS,                )   CASE NO. 6134  
Defendant                         )

COUNT ONE

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

From the Southeast Corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet, for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the said East boundary of said section, 388.4 feet, more or less, to a point on the North boundary of the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of said section 28, thence run East along said North boundary of S $\frac{1}{2}$  of SE $\frac{1}{4}$  of SE $\frac{1}{4}$ , 336.4 feet to a point on the East boundary of said Section 28; thence run South along the section line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of Section 28, T4S, R2E, Baldwin County, Alabama.

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

COUNT TWO

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

From the Southeast Corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet, for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the said East boundary of said section, 388.4 feet more or less, to a point on the North boundary of the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of said Section 28, thence run East along said North boundary of S $\frac{1}{2}$  of SE $\frac{1}{4}$  of SE $\frac{1}{4}$ , 336.4 feet to a point on the East boundary of said Section 28; thence run South along the Section line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South  $\frac{1}{2}$  of the Southeast  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$  of Section 28, T4S, R2E, Baldwin County, Alabama.

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 defendant entered and unlawfully withhold,  
together with \$1,000.00 for detention thereof.

GIBBONS & STOKES

BY: E. Graham Gibbons  
E. GRAHAM GIBBONS  
Attorney for Plaintiff

Serve the defendant at Route #1, Box 139, Daphne, Alabama.

FILED

AUG 8 1964

ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6134

TERM. 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Katie Lee Thomas

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

Katie Lee Thomas, Defendant

by Jim Walter Corporation, a corporation,

Plaintiff

Witness my hand this 23rd day of August 1964

64-9-9-64

Alice D. Duck Clerk

No. 6134

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JIM WALTER CORPORATION, A Corporation,  
Plaintiffs

vs.

KATIE LEE THOMAS

At 1 Bay 139

Dogfish

Defendants

SUMMONS AND COMPLAINT

Filed August 3, 1964

Alice J. Duck Clerk

GIBBONS & STOKES

P.O. Box 293 Plaintiff's Attorney  
Mobile, Alabama

Defendant's Attorney

Defendant lives at

Received In Office

Aug 30 1964

Sheriff

I have executed this summons

this 9/9/64 19.....  
by leaving a copy with

Katie Lee Thomas

Sherriff's Office

10 Cents per line

TAYLOR WILKINS

DEPUTY SHERIFF

Taylor Wilkins Sheriff

W.C. Garner Deputy Sheriff

Spanishfort