

MAGNOLIA LAND COMPANY, a Corporation

PLAINTIFF

VS

THOMAS A. SMITH AND CAROLYN SMITH,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, NO. 5956

COMPLAINT

The Plaintiff sues to recover possession of the following tract of land:

Lots 18, 19 and 20, all lying in and being a part of the resubdivision of Lots 1 to 29 and Lots 212 to 223 of Lillian Beach, according to the plat thereof recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Map Book 4 at Page 6, all in Baldwin County, Alabama,

of which it was in possession, and upon which, pending such possession, and before commencement of this suit, the defendants entered and unlawfully withhold, together with Five Hundred and NO/100 (\$500.00) Dollars for the detention thereof.

FILED

MAR 3 1900

ALICE L. DUCK, CLERK
REGISTER

James A. Quinn
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Thomas A. Smith, Sr. and Carolyn Smith

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 _____

Thomas A. Smith, Sr. and Carolyn Smith _____, Defendant. S.

by _____

Magnolia Land Company, a corporation _____, Plaintiff.

Witness my hand this 3rd day of March 1964

Ex-3-28-64

Alice J. Smith _____, Clerk

No. 5956

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Magnolia Land Company, a
corporation Plaintiffs

vs.

Thomas A. Smith, Sr. and

Carolyn Smith

Lillian, Ala - Defendants

Summons and Complaint

Filed _____ 19____

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Both reside at
Lillian, Alabama

Received In Office

3/3, 1944

Taylor Wilkins
Sheriff.

I have executed this summons

this March 28 1944
by leaving a copy with

Thomas A. Smith Sr.
Carolyn Smith

Sheriff claims 200 miles at
Ten Cents per mile Total \$ 20.00
TAYLOR WILKINS, Sheriff

BY C. Chesser
DEPUTY SHERIFF

C. Chesser
Sheriff.

Deputy Sheriff.

Lillian

MAGNOLIA LAND COMPANY, a Corporation)
Plaintiff)
vs)
THOMAS A. SMITH AND CAROLYN SMITH,)
Defendants)

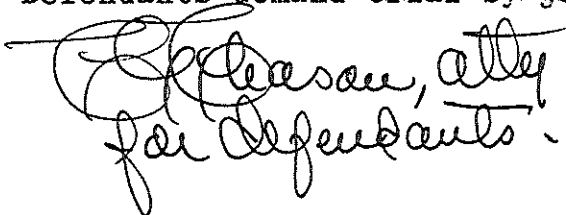
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5956

DEMURRER

Come the Defendants in the above styled cause and demurring to the Complaint heretofore filed therein, say that the complaint does not state a cause of action.


Attorney for Defendants

Defendants demand trial by jury.


for Defendants.

FILED
APR 17 1936
ALICE J. DUCK, CLERK
REGISTER

CECIL G. CHASON
ATTORNEY-AT-LAW
FOLEY, ALABAMA

April 15, 1964

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

Dear Mrs. Duck: Re: Magnolia Land Company, a Corporation
vs Thomas A. Smith and Carolyn Smith

I am enclosing ^{Decease} ~~answer~~ in the above styled cause, a
copy of which has this day been sent to the Attorney for
the Plaintiff.

Yours very truly,



C. G. Chason

CGC:dc

cc: Mr. James A. Brice
Attorney at Law
Foley, Alabama



NOTE-D-GRAM

© THE DRAWING BOARD - BOX 305 - DALLAS, TEXAS

JAMES A. BRICE

ATTORNEY AT LAW

BOX 298 • FOLEY, ALABAMA • WH 3-3601

MESSAGE

TO

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

DATE March 2, 1964

Re: Magnolia Land Company
Vs: Thomas A. Smith and Carolyn Smith

Enclosure: Summons and Complaint

BY

INSTRUCTIONS TO SENDER:

1. KEEP YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

REPLY

DATE

SIGNED

INSTRUCTIONS TO RECEIVER:

1. WRITE REPLY. 2. DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

Feb 2