

JACK E. DUNLAP AND RUBY C. DUNLAP

PLAINTIFFS

VS

JINKS HINOTE

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW, NO.

3957

COMPLAINT

The Plaintiffs sue to recover possession of the following tract of land:

The Northwest Quarter of the Southwest Quarter of the Southwest Quarter, Section 15, Township 6 South, Range 5 East, Baldwin County, Alabama,

of which they were in possession, and upon which, pending such possession, and before commencement of this suit, the Defendant entered and unlawfully withholds, together with Five Hundred Dollars (\$500.00) for the detention thereof.

FILED

MAR 3 1934

ALICE L. DUCK, CLERK
REGISTER

James A. B...
Attorney for Plaintiffs

FILED

MAR 3 1934

ALICE L. DUCK, CLERK
REGISTER

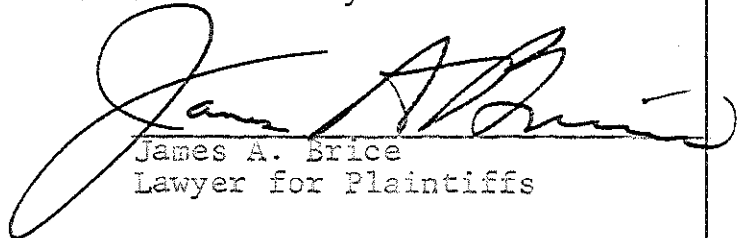
JACK E. DUNLAP and
RUBY C. DUNLAP,
Plaintiffs

VS

JINKS HINOTE,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 5957

The Plaintiffs demand an abstract in writing of the
title or titles on which the Defendant will rely.


James A. Brice
Lawyer for Plaintiffs

FILED
MAY 15 1965
CLERK
REGISTER

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

Jinks Hinote

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 -----

Jinks Hinote

-----, Defendant-----

by -----

Jack E. Dunlap and Ruby C. Dunlap

-----, Plaintiff. S-----

Witness my hand this

3rd

day of

March

1964

64-4-23-64

Alice X. Duck

-----, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Jack E. Dunlap and Ruby C.

Dunlap

Plaintiffs

vs.

Jinks Hinote

East of R Dale
Jack Dunlap Defendants

Summons and Complaint

Filed FILED 19

MAR 2 1964

Clerk

**ALICE L. DUCK, CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

Received In Office

3/3, 1964

Walter Wilkins
Sheriff.

I have executed this summons

this April 23 1964
by leaving a copy with

Jinks Hinote

Sheriff claims 50 miles at 300
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY Hall
DEPUTY SHERIFF

Sheriff.

H F Hall
Deputy Sheriff.

JACK E. DUNLAP and RUBY
DUNLAP,

Plaintiff,

Vs.

JINKS HINOTE,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5957

MOTION

Comes now the Defendant, Jinks Hinote, and shows unto the
Court as follows:

1.

That on the 3rd day of March, 1964, the Plaintiffs sued
the Defendant in ejectment for the lands described in their
Bill of Complaint.

2.

That on the 30th day of April, 1964, the Defendant answer-
ed the Plaintiffs' Bill of Complaint and made a demand on him
for an abstract of title. The Defendant further shows unto
the Court that the Plaintiffs have to this date failed to
furnish the Defendant with such an abstract. That this case
is now on the jury docket and is set for trial on the 17th day
of September, 1964.

Premises considered, your Movant prays that your Honor
will enter an order directing the Plaintiffs or their attorney
to furnish the Defendant an abstract of his title on or before
9:00 a.m., the 17th day of September, 1964, and upon failure
to do so, cause him to suffer such penalties as is provided
for in the Code of Alabama, Title 7, Section 940.

WILTERS & BRANTLEY

BY:


Attorney for Defendant

Received 16 day of Sept 1964
and on 16 day of Sept 1964

I served a copy of the within

on Jack Dunlap as James
F. Brice

By service on James C. Brice

TAYLOR WILKINS, Sheriff
Jim Eastburn D. S.
Foley, Ala.

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

STATE OF ALABAMA
BALDWIN COUNTY

Personally appeared before me, the undersigned authority, Tolbert M. Brantley, who after being by me first duly sworn, deposes and says: That he has read the foregoing Motion and that the facts alleged therein are true and correct.

Tolbert M. Brantley
Tolbert M. Brantley

Sworn to and subscribed before me on this the 15th day of September, 1964.

Walter J. Wilkins, Jr.
Notary Public State of Alabama at Large

.....

ORDER

This day came the Defendant, by his Attorney, and moved the Court for the relief set out in the foregoing Motion. And upon consideration of the same, The Court is of the opinion that he is entitled to such relief.

It is, therefore, ORDERED, ADJUDGED and DECREED that Jack E. Dunlap and Ruby Dunlap, the Plaintiffs in this cause, will furnish the Defendant, or his Attorney, an abstract of the title to the property sued for in his Bill of Complaint on or before 9:00 a.m., on the 17th day of September, 1964, and upon failure to do so, he shall suffer the penalties provided for in Title 7, Section 940, of the Code of Alabama.

Done this the 16 day of September, 1964.

P. S. Moore
Circuit Judge

TO THE SHERIFF OF
BALDWIN COUNTY, ALABAMA

You are hereby directed to serve a copy of the foregoing Motion and Order on the Plaintiffs, or their Attorney of Record, instantner, and make your return thereof to this Court.

P. S. Moore
Circuit Judge

Filed 9-16-64
Clerk

EX-9-16-64

JACK E. DUNLAP and RUBY
C. DUNLAP,

Plaintiffs,

Vs.

JINKS HINOTE,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5957

PLEA

1.

Not guilty.

- - - - -

The Defendant demands an abstract in writing of the title
or titles on which the Plaintiffs will rely for recovery of
the land sued for.

WILTERS & BRANTLEY

BY:

James M Brantley
Attorney for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY:

James M Brantley
Attorney for Defendant

FILED

APR 30 1964

ALICE L. DUCK, CLERK
REGISTER

NOTE-O-GRAM

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JAMES A. BRICE
ATTORNEY AT LAW
BOX 298 • FOLEY, ALABAMA • WH 3-3601

MESSAGE

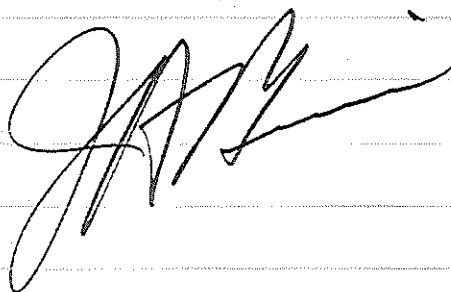
REPLY

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

DATE **March 2, 1964**

Re: Dunlap vs Hinote

Enclosure--Summons and Complaint



BY

INSTRUCTIONS TO SENDER:

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

DATE

SIGNED

INSTRUCTIONS TO RECEIVER:

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

6-9-64