

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

March 22, 1965

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

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

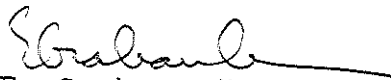
Re: Jim Walter Corporation vs. Mitchell Jernigan and  
Willie Mae Jernigan, Case NO. 6318

Dear Mrs. Duck:

I would appreciate your entering a non suit on the motion  
of the plaintiff in the above captioned matter, and forwarding  
the cost bill to me.

Thank you very much for your attention to this matter.

Sincerely,

  
E. Graham Gibbons

EGG:d

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6318

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mitchell Jernigan and Willie Mae Jernigan,  
Jointly & Individually

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 ~~Miss~~.....

Mitchell Jernigan and Willie Mae Jernigan, Jointly & Individually..... Defendant.....

by Jim Walter Corporation, a Corporation.....

....., Plaintiff.....

Witness my hand this 25th..... day of November..... 1964.....

Allice J. Luck..... Clerk

JIM WALTER CORPORATION,  
A corporation,

Plaintiff

VS:

MITCHELL JERNIGAN and  
WILLIE MAE JERNIGAN, jointly  
and individually

Defendants

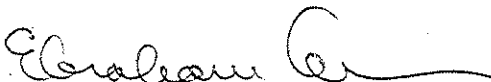
) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY,  
) ALABAMA  
) AT LAW

) CASE No. 6318

The plaintiff claims of the defendants \$1,400.00 for the use and occupation by the defendants of the following tract of land, viz:

Beginning at the Southwest Corner of the Northeast Quarter of Section 9, Township 3 South, Range 2 East, thence proceed along the South line of the Northeast Quarter of said Section, Township, and Range a distance of 200 feet to the point of beginning; thence proceed North a distance of 100 feet to a point; thence proceed East a distance of 50 feet to a point; thence proceed South a distance of 100 feet to a point; thence proceed West a distance of 50 feet back to the point of beginning. All situated in Section 9, Township 3 South, Range 2 East, Baldwin County, Alabama, belonging to the plaintiff, from the 15th day of July 1962 to the 15th day of November 1964.


GIBBONS & STOKES

  
E. Graham Gibbons  
Attorney for the Plaintiff

Please serve the defendant by registered mail, General Delivery, Bay Minette, Alabama.

The plaintiff, being a foreign corporation, duly qualified to do business in the State of Alabama, I as attorney for the Plaintiff hereby guarantee security per costs.

FILED  
NOV 25 1964

  
E. Graham Gibbons  
Attorney at Law

ALICE J. DUCK, CLERK  
REGISTER

GIBBONS & STOKES

ATTORNEYS AT LAW  
308-309 VAN ANTWERP BUILDING  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

November 24, 1964

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

6318

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

Re: Jim Walter Corp. vs. Mitchel Jernigan &  
Willie Mae Jernigan

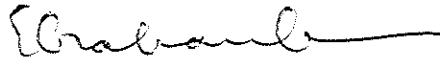
Dear Mrs. Duck:

I enclose herein an original and two copies of a complaint 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 defendants' address is General Delivery, Bay Minette, Alabama.

Thank you very much for your attention to this matter.

Sincerely yours,



E. Graham Gibbons  
Attorney for Jim Walter Corp.

EKG:m  
Encl

JIM WALTER CORPORATION  
a corporation

Plaintiff

vs:

MITCHELL JERNIGAN and  
WILLIE MAE JERNIGAN, jointly  
and individually

Defendants

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 6318

Come the defendants in the above styled cause and  
demur to the complaint filed in said cause and for demurrer  
show unto this Honorable Court as follows:

1. That said complaint fails to state a cause of  
action.

2. That said complaint fails to allege a demise  
to the defendants herein.

THOMPSON & WHITE

BY: 

Attorneys for defendants.

FILED

DEC 21 1964

ALICE L. DUCK, CLERK  
REGISTER

JIM WALTER CORPORATION,  
A corporation,

Plaintiff

VS:

MITCHELL JERNIGAN and  
WILLIE MAE JERNIGAN, jointly  
and individually

Defendants

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

CASE No. 6318

The plaintiff claims of the defendants \$1,400.00 for the use and occupation by the defendants of the following tract of land, viz:

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E. Graham Gibbons  
E. Graham Gibbons  
Attorney for the Plaintiff

Please serve the defendant by registered mail, General Delivery, Bay Minette, Alabama.

The plaintiff, being a foreign corporation, duly qualified to do business in the State of Alabama, I as attorney for the Plaintiff hereby guarantee security per costs.

E. Graham Gibbons  
E. Graham Gibbons  
Attorney at Law

FILED  
NOV 25 1964

ALICE I. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6318

.....TERM. 19.....

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Jointly & Individually

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in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against ~~Krick~~  
Mitchell Jernigan and Willie Mae Jernigan, Jointly & Individually, Defendant.....

by Jim Walter Corporation, a Corporation

..... Plaintiff.....

Witness my hand this 25th day of November 1964

Alice J. Luck Clerk

Ex-11-28-64 on Willie Mae Jernigan  
N.F. on Mitchell Jernigan

No. 6318

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JIM WALTER CORPORATION, A Corp.

Plaintiffs

vs.

MITCHELL JERNIGAN & WILLIE MAE  
JERNIGAN, Jointly & Individually

Defendants

SUMMONS AND COMPLAINT

Filed November 25, 1964

Alice J. Duck Clerk

*Sibbens & Stokes*  
P.O. Box 292 Plaintiff's Attorney  
Mobile

Defendant's Attorney

Defendant lives at

Received In Office

11/25 1964

I have executed this summons  
this Nov 28 1964

by leaving a copy with

*Willie Mae Jernigan**Mitchell Jernigan  
Not found in this  
County*

Sheriff claims

Ten Cents per mile

TAYLOR WILKINS, Sheriff

BY

*Taylor Wilkins* Sheriff  
*W. G. Talbot* Deputy Sheriff

*Bromley*