

SAMUEL GRAVES LOWREY, as Executor
and Trustee under the Last Will
and Testament and Codicil of J.
F.B. Lowrey, deceased, ELOISE RUSSELL
LOWREY, L. T. RHODES, JR., CLARA
BOLON, ELOISE MARTIN, ORLANDO J.
MANCI, LORENA M. BRYARS, FLORENCE M.
WEBB, FRANCES M. LAW and ORLANDO
J. MANCI, JR.,

Plaintiffs,

VS

B. B. WHITE,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6354

Comes now defendant and for answer in the above styled
cause:

1. Not guilty.

2. Defendant suggests upon the record that he has
had, for three years next before the commencement of this suit,
adverse possession of the lands which are the subject of this
suit.

W. H. Hay
Attorney for Defendant

Defendant demands trial

by jury.

This 27th day of June, 1967.

W. H. Hay
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27th day of June,
1967 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.

W. H. Hay

FILED

JUN 28 1967

CLERK
REGISTRY VOL

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STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon B. B. WHITE to appear within thirty (30) days from the service 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 SAMUEL GRAVES LOWREY, as Executor and Trustee under the Last Will and Testament and Codicil of J. F. B. Lowrey, deceased, ELOISE RUSSELL LOWREY, L. T. RHODES, JR., CLARA BOLON, ELOISE MARTIN, ORLANDO J. MANCI, LORENA M. BRYARS, FLORENCE M. WEBB, FRANCES M. LAW and ORLANDO J. MANCI, JR.

Witness my hand this 31st day of December, 1964.

Alice J. Duck
Clerk of the Circuit Court

* * * * *

SAMUEL GRAVES LOWREY, as Executor)
and Trustee under the Last Will)
and Testament and Codicil of J. F. B.)
Lowrey, deceased, ELOISE RUSSELL)
LOWREY, L. T. RHODES, JR., CLARA)
BOLON, ELOISE MARTIN, ORLANDO J.)
MANCI, LORENA M. BRYARS, FLORENCE M.)
WEBB, FRANCES M. LAW and ORLANDO J.)
MANCI, JR.,)
Plaintiffs,)
VS.)
B. B. WHITE,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6334

COMPLAINT

The plaintiffs sue to recover possession of the following tracts of land situated in Baldwin County, Alabama, to-wit:

All of that part of the South Half of the Northeast Quarter of Section 4, Township 3 South, Range 3 East, which lies between the East right of way line of United States Highway No. 31 and the West right of way line of the Bay Minette and Fort Morgan branch of the Louisville and Nashville Railroad.

All of that part of the Northeast Quarter of the Southeast Quarter of Section 4, Township 3 South, Range 3 East,

which lies West of the West right of way line of the Bay Minette and Fort Morgan branch of the Louisville and Nashville Railroad,

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

J. B. Blackburn

Attorney for Plaintiffs

FILED

DEC 31 1964

ALICE L. DUCK, CLERK
REGISTER

no. 6354

Samuel Graves Lowery
as executor etc

D.S.

B. B. White

Received 31 day of May 1867
and on 1 day of June 1867
inserted a copy of the within etc
on B. B. White

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Tolbert D. S.

5 miles South of B. B.

Sheriff claims 10 miles at

Ten Cents per mile Total \$ 1.00

TAYLOR WILKINS, Sheriff,

BY

W. A. Tolbert

DEPUTY SHERIFF

SAMUEL GRAVES LOWREY, ET AL,)	
)	
Plaintiffs,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
B. B. WHITE,)	AT LAW NO. 6354
)	
Defendant.)	

AMENDED COMPLAINT

Now come the plaintiffs in the above styled cause and amend the complaint heretofore filed in said cause so that as amended the complaint will read as follows:

"The plaintiffs sue to recover possession of the following tracts of land situated in Baldwin County, Alabama, to-wit:

All of that part of the South Half of the Northeast Quarter of Section 4, Township 3 South, Range 3 East, which lies between the East right-of-way line of United States Highway No. 31 and the West right-of-way line of the Bay Minette and Fort Morgan branch of the Louisville and Nashville Railroad.


All of that part of the Northeast Quarter of the Southeast Quarter of Section 4, Township 3 South, Range 3 East which lies West of the West right-of-way line of the Bay Minette and Fort Morgan branch of the Louisville and Nashville Railroad, excepting therefrom the following:

EXCEPTION NO. 1: From the Northwest corner of the Southeast Quarter of the Northeast Quarter of Section 4, Township 3 South, Range 3 East which point is marked by an iron post on the Western margin of the L & N Railroad right-of-way, run South 17° 50' East along said Railroad, 243.1 feet for a point of beginning; thence run South 81° 42' West 266.9 feet to a point on the Eastern margin of the right-of-way of U. S. Highway No. 31; thence run Southwardly along said Highway a distance of 300 feet; thence run North 81° 02' East 313 feet to a point on the said Railroad right-of-way situated 300 feet Southwardly from the point of beginning, measured along said Railroad; thence run North 17° 50' West 300 feet to the point of beginning. Lot contains 1.9969 acres and lies in the South Half of the Northeast Quarter of Section 4, Township 3 South, Range 3 East,

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

FILED

APR 12 1968


Attorney for Plaintiffs

ALICE J. DUCK CLERK
REGISTER

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