

E. G. RICKARBY

392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532

March 31, 1965

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

6461

Dear Mrs. Duck:

Inre: J. T. Hackmeyer

Vs: Sam Brown, Annie Brown, Jessie Brown and Sallie Brown
Our File: 65-74

Enclosed find Summons and Complaint in the above styled
cause.

Please process and oblige and charge to my account; also,
hand copies of same to Sheriff.

Thanks.

Yours very truly,



jlb
Encls.
4-15-65
cc: Sheriff
cc: Mr. Hackmeyer

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4-15-65
cc: Sheriff
cc: Mr. Hackmeyer

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____
TERM, 1965.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon SAM BROWN, ANNIE BROWN, JESSIE BROWN and SALLIE BROWN 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 SAM BROWN, ANNIE BROWN, JESSIE BROWN and SALLIE BROWN, Defendants, by J. T. HACKMEYER, Individually, Plaintiff.

WITNESS my hand this 5 day of April, 1965.

Alice J. Duck Clerk.

J. T. HACKMEYER,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
VS.	I	BALDWIN COUNTY, ALABAMA,
SAM BROWN, ANNIE BROWN,	I	AT LAW.
JESSIE BROWN and SALLIE BROWN,	I	<u>6461</u>
Defendants.	I	

C O M P L A I N T

Count I.


The Plaintiff sues to recover possession of the following described tracts of land, to-wit:

Beginning at the Northeast corner of the Northwest quarter of the Southeast quarter of Section 24, Township 4 South, range 2 East, Baldwin County, Alabama.

Run West along the $\frac{1}{2}$ section line 632 feet; thence run South 208.71 feet to the Southeast corner of lot heretofore conveyed by Grantor to C. L. Kimbrough; thence run West 20 feet for a point of beginning; thence run West; paralleled to said section line; 418 feet; thence run South 209 feet; thence run East 418 feet; to a point on the West side of a 20 foot lane; thence run North 209 feet to the point of beginning; together with the right of ingress and egress oversaid 20 feet land. Lying in the Northwest quarter of Southeast quarter of Section 24, Township 4 South, Range 2 East, Baldwin County, Alabama.

of which the Plaintiff has legal title, and upon which, before the commencement of this suit, the Defendant entered

and unlawfully withhold together with ONE HUNDRED (\$100.00)
DOLLARS for the detention thereof.



E. G. RICKARBY, Attorney for
Plaintiff.

Defendant's address is Spanish Fort, Daphne, Alabama.

FILED
APR 5 1965
ALICE J. DUCK, CLERK
REGISTER

64-4-9-65

Case No 6461

Received 5 day of April 1965
and on 9 day of April 1965

I served a copy of the within 5cc
on Sam Brown, Annie
Brown, Jessie Brown,

By service on Sallie Brown,
Taylor Wilkins

TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Daphne

Sheriff claims 216 miles at
Ten Cents per mile Total \$ 21.60
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

J. T. Hackmeyer
Pit.

vs -

Sam Brown, Annie
Brown, Jessie Brown,
+ Sallie Brown.

Dept.

FILED

APR 5 1965

ALICE L. DICK, CLERK
REGISTER