

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS

B. F. STOKES, III

MAILING ADDRESS

P. O. BOX 293

MOBILE, ALABAMA, 36601

September 26, 1966

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

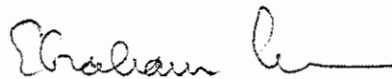
Re: Mid-State Homes, Inc. vs. Addie Heard

Dear Mrs. Duck:

On September 19, 1966 I forwarded to you a complaint captioned Jim Walter Corporation vs. Addie Heard. I would appreciate your accepting this letter as notification to the Court that the plaintiff requests a non-suit.

I would appreciate your also forwarding to me the cost bill in this matter.

Sincerely,



E. Graham Gibbons

EGG:jh

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MOBILE, ALABAMA, 36601

September 19, 1966

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

Re: Mid-States Homes, Inc. vs. Addie Heard


Dear Mrs. Duck:

I enclose herein an original and one copy of a complaint in ejectment 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 defendant's address is Route 2, Box 213-C, Fairhope, Alabama.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EGG:he

Enclosure

JIM WALTER CORPORATION,)	IN THE CIRCUIT COURT OF
A Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	
VS.)	AT LAW
)	
ADDIE HEARD,)	
)	
Defendant.)	CASE NO. <u>7187</u>

C O M P L A I N T

COUNT ONE

The plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama:

From the NW corner of the NW 1/4 of the NE 1/4 of Section 20, Township 6 South, Range 2 East, run South 1331.5 feet; thence run West 851.6 feet; thence run South 16.5 feet to the point of beginning; thence run West 50 feet; thence run South 142.5 feet; thence run East 50 feet; thence run North 142.5 feet to the point of beginning, containing 0.16 acre, more or less, in the SE 1/4 of the NW 1/4 of Section 20, Township 6 South, Range 2 East, Baldwin County, Alabama.

of which the plaintiff was in possession and upon which, pending such possession and before the commencement of this suit, the defendant entered and unlawfully withheld, together with \$1,000.00 for the detention thereof.

COUNT TWO

The plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

From the NW corner of the NW 1/4 of the NE 1/4 of Section 20, Township 6 South, Range 2 East run South 1331.5 feet; thence run West 851.6 feet; thence run South 16.5 feet to the point of beginning: Thence run West 50 feet; thence run South 142.5 feet; thence run East 50 feet; thence run North 142.5 feet to the point of beginning, containing 0.16 acre, more or less, in the SE 1/4 of the NW 1/4 of Section 20, Township 6 South, Range 2 East, Baldwin County, Alabama.

to which said tract of land the plaintiff has the legal title, and

upon which tract of land, before the commencement of this suit,
the defendant entered and unlawfully withheld, together with
\$1,000.00 for detention thereof.

GIBBONS & STOKES

BY



E. Graham Gibbons

Attorney for the Plaintiff

Since the plaintiff is a non-resident corporation, I hereby
hold myself liable for costs.



E. Graham Gibbons

Attorney for the Plaintiff

Serve the defendant at:

Route 2, Box 213-C
Fairhope, Alabama

FILED

SEP 20 1936

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Addie Heard

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.....

Addie Heard

....., Defendant.....

by Jim Walter Corporation

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

Witness my hand this..... 20 day of..... Sept 19 66

EX-9-24-66

165

Archie Smith Clerk

No. 7187

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JIM WALTER CORPORATION,
a corp

Plaintiffs

vs.

ADDIE HEARD

Defendants

SUMMONS AND COMPLAINT

Filed 9-20 19 66

Alice J. Duck Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

SEP 20 1966 19.....

TAYLOR WILKINS
SHERIFF Sheriff

I have executed this summons

this Sept. 24 1966

by leaving a copy with

Addie Heard
I hope

Sheriff claims 70 miles at

Less costs per mile Total \$ 7.00

By TAYLOR WILKINS, Sheriff

By Roy Randall Deputy Sheriff

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff