

R. A. Norred
ATTORNEY

101-A 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM 3, ALABAMA
TELEPHONE
323-4076

March 10, 1967

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

Re: Mid-State Homes, Inc.
vs.
Annie Coleman
At Law - Case No. 7359

Dear Mrs. Duck:

It is my impression that the above case is ready for a default judgment.

As I understand Title 7, Section 951, the defendant's default operates as an admission of title in the plaintiff, but that the plaintiff cannot recover costs in the absence of proof of possession by the defendant.

It is my suggestion - if it would not be too much trouble to you, that you present the file to the Judge with the request that he enter a default judgment for the plaintiff for the property sued for, and that costs be taxed against the plaintiff. I am enclosing a suggested form for such default judgment.

I will appreciate hearing from you as to whether or not a judgment has been entered.

Yours very truly,

R. A. Norred
R. A. Norred *By HAN*

RAN/hn

Enc.

R. A. Norred

ATTORNEY

101-A 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM 3, ALABAMA
TELEPHONE
323-4076

February 1, 1967

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

Re: Mid-State Homes, Inc.
vs.
Annie Coleman

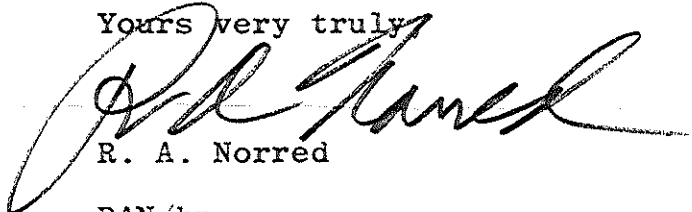
7359

Dear Mrs. Duck:

I enclose herein an original and one copy of a Summons and Complaint for filing and service in the above. The Defendant's address is Rt. 1, Box 30, Bay Minette, Alabama.

I would appreciate it very much if you would acknowledge receipt hereof, and if you would also advise when service has been perfected on the Defendant.

Yours very truly



R. A. Norred

RAN/hn

Enc.

R. A. Norred
ATTORNEY

101-A 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM 3, ALABAMA
TELEPHONE
323-4076

March 23, 1967

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

Re: Mid-State Homes, Inc.
vs.
Annie Coleman
At Law - Case No. 7359

Dear Mrs. Duck:

I am enclosing herein an original and one copy of a Writ of Possession which I would like to have issued under the judgment rendered in the above case.

I believe it would be desirable to have one of my client's representatives, who is authorized to accept possession for my client, contact the Sheriff within the next few days and make arrangements for accepting possession of the property described in the Writ.

I am, of course, sending a copy of this letter to the Sheriff so that he will be informed of these arrangements, and will know to expect one of my client's representatives to contact him in the immediate future.

Yours very truly,


R.A. Norred

RAN/hn

Enc.

CC: Office of the Sheriff
Baldwin County, Alabama
Bay Minette, Alabama

Mr. Billy J. Quick
Regional Supervisor
Mid-State Homes, Inc.
Birmingham, Alabama

MID-STATE HOMES, INC.
a corporation,

PLAINTIFF

VS.

ANNIE COLEMAN,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7359

DEFAULT JUDGMENT

This day came the plaintiff by its attorney and the defendant being called, came not, but made default, and on motion of the plaintiff, it is considered and adjudged, and it is the judgment of the Court, that judgment be and the same is hereby rendered in favor of the plaintiff and against the defendant for the following described property:

Begin at the SE corner of the NE $\frac{1}{4}$, Section 30, T2S, R3, run No. 1344', thence West 414' to POB. Run West 246', thence No. 315', thence North 29 deg. East 281', thence South 452' to POB. Section 30, T2S, R3, containing 2.1 acres and 4 room frame house, situated in Baldwin County, Alabama.

It is, therefore, considered, ordered, and adjudged by the Court that the plaintiff have and recover of the defendant the aforesaid property, and that the costs herein are taxed against the plaintiff, for all of which let execution issue.

This, the 27th day of March, 1967.

Walter J. Wadsworth
JUDGE

FILED
MAR 15 1967
BALDWIN COUNTY, ALA.

RECORDED

1967 MAR 24

MID-STATE HOMES, INC.
a corporation,

PLAINTIFF

VS.

ANNIE COLEMAN,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7359

WRIT OF POSSESSION

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF SAID STATE - GREETINGS:

You are hereby commanded to deliver to Mid-State Homes, Inc., a corporation, possession of the lands and tenements which the said Mid-State Homes, Inc., a corporation, recovered of Annie Coleman by the judgment of our Circuit Court, held for the County of Baldwin on the 13th day of March, 1967, to-wit:

Begin at the SE corner of the NE¹/₄, Section 30, T2S, R3, run No. 1344', thence West 414' to POB. Run West 246', thence No. 315' thence North 29 deg. East 281', thence South 452' to POB. Section 30, T2S, R3, containing 2.1 acres and 4 room frame house, situated in Baldwin County, Alabama.

You are further commanded to make return of this Writ and the execution thereof according to law.

Witness my hand, this the 24 day of March, 1967.

Alicia M. Murch
CLERK

Executed
3-31-67

RECEIVED

MAR 24 1967

TAYLOR WILKINS
SHERIFF

on 24 day of Mar 1967
on 31 day of March 1967
had a copy of the within Will of Per
Annie Coleman

TAYLOR WILKINS, Sheriff

D. Vill

Dept. has moved
from property.

The within described
property has been
released to the City

no. 7359

Mid. State Homes

Annie Coleman

Will of Per

STATE OF MISSISSIPPI
COUNTY OF HANCOCK
TO THE HONORABLE CLERK OF THE DISTRICT COURT
IN AND FOR THE COUNTY OF HANCOCK, MISSISSIPPI
I, TAYLOR WILKINS, Sheriff of the County of Hancock, Mississippi, do hereby certify that the within described property, to-wit: Will of Per, is the property of Annie Coleman, who is deceased, and that the same has been released to the City of Meridian, Mississippi, for the purpose of public use.
WITNESSED my hand and the seal of my office this 24 day of March, 1967.
TAYLOR WILKINS, Sheriff

NOTED
MAR 24 1967
CLERK OF DISTRICT COURT
MERIDIAN, MISSISSIPPI

Will of Per

March 24, 1967

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ANNIE COLEMAN

to appear within thirty days from the date 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 MID-STATE HOMES,
INCORPORATED, a corporation.

Witness my hand this 3rd day of February, 1967.

Alice J. Luck
CLERK

MID-STATE HOMES, INCORPORATED,
a corporation,

PLAINTIFF,

VS.

ANNIE COLEMAN

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 2359

COMPLAINT

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


Begin at the SE corner of NE $\frac{1}{4}$, Section 30, T2S, R3, run
No. 1344', thence West 414' to POB. Run West 246', thence
No. 315', thence North 29 deg. East 281', thence So. 452'
to POB. Section 30, T2S, R3, containing 2.1 acres and
4 room frame hse. situated in Baldwin County, Alabama.

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, 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:

(The Plaintiff incorporates herein as if fully and completely set out at length herein by reference and adoption, the full legal description of the real estate set out and described in Count One of the Complaint.)

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 defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.


R. A. RORRED, ATTORNEY FOR PLAINTIFF
101-A 2121 Building
2121 8th Ave. North
Birmingham, Alabama
Telephone 323-4076

PLAINTIFF'S ADDRESS:

Mid-State Homes, Inc.
P.O.Box 9128
Tampa, Florida

FILED
FEB 3 1967
ALICE L. DICK, CLERK
REGISTERED

DEFENDANTS' ADDRESS:

Annie Coleman
Rt. 1 Box 30
Bay Minette, Alabama

7359

Served on 3 day of Feb. 1967
Served a copy of the within 8 day of Feb 1967
St C
Annie Coleman

Mid-State Homes,
Inc. a Corp.
Plaintiff

Service on _____

TAYLOR WILKINS, Sheriff

By W. A. Gilbert
D-Vell

vs.

Annie Coleman
Defendant

Sheriff claims 4 miles at
Ten Cents per mile Total \$.40
TAYLOR WILKINS, Sheriff
BY W. A. Gilbert
DEPUTY SHERIFF

FILED

FEB 3 1967

ALICE J. DUCK, CLERK
REGISTER