

SAMUEL GRAVES LOWREY, as
Executor and Trustee under
the Last Will and Testament
and Codicil of J. F. B.
Lowrey, Deceased,

Plaintiff,

vs.

JENKS HINOTE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 7632

ANSWER

Comes now the Defendant in the above styled
cause and for answer to the Plaintiff's Bill of Complaint
says:

1. Not guilty.

WILTERS, BRANTLEY & NESBIT

By: Thyler S. Nesbit
Attorneys for Defendant

The Defendant demands a trial by jury.

WILTERS, BRANTLEY & NESBIT

BY: Thyler S. Nesbit
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24 day of February
1967 served a copy of the foregoing pleading on _____
parties to this proceeding by mailing the same by _____
Mail, properly addressed, and first class post _____

WILTERS, BRANTLEY & NESBIT

By: Thyler S. Nesbit

FILED

FEB 24 1967

CLERK
RECEIVED

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jenks Hinote to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the 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.

WITNESS my hand this 8th day of February, 1967.

Brian Jackson
Clerk

Defendant resides at Seminole, Alabama.

* * * * *

SAMUEL GRAVES LOWREY, as
Executor and Trustee under
the Last Will and Testament
and Codicil of J. F. B.
Lowrey, deceased,

Plaintiff,

VS.

JENKS HINOTE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

W. 7362

COMPLAINT

Plaintiff sues to recover possession of the following tract of land situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of Section 22, Township 6
South, Range 5 East, EXCEPTING therefrom the
Northwest Quarter of the Northwest Quarter of
the Northwest Quarter thereof,

of which he was in possession, and upon which, pending such possession and before the commencement of this suit, the defendant entered and unlawfully withholds, together with Three Thousand Dollars (\$3,000.00) for the detention thereof.

FILED
FEB 8 1967
ALICE L. BUCK, CLERK
REGISTER

[Signature]
Attorney for Plaintiff

received 8 day of Feb. 1967
and on 13 day of Feb. 1967
serve a copy of the within 8 & c
Jenks Ninite

by service on _____

TAYLOR WILKINS, Sheriff
By Hall D. S.

R. H. Wilkins

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY H. Hall
DEPUTY SHERIFF

7362
~~7637~~

Samuel Graves Lowery

vs

Jenks Ninite

FILED
FEB 8 1967
ALICE L. DUK, CLERK
RECORDS

Jas. R. Owens

Forworn M. H. King

We the Board have part of Dismant
receiving the cultivated land
that in cultivation at present

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7632

FILED
MAY 4 1962
ALICE L. DICK, CLERK
REGISTER

SAMUEL GRAVES LOWREY, as
Executor and Trustee under
the Last Will and Testament
and Codicil of J. F. B.
Lowrey, deceased,

Plaintiff,

VS.

JENKS HINOTE,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. ~~7632~~
7362

For answer to the Plaintiff's Demand for Abstract, the Defen-
dant comes now and says:

1.

That he will depend upon adverse possession and the rule of repose
to prove his title in this matter.

Tolbert M. Brantley
Tolbert M. Brantley
Attorney for Defendant

DEMAND FOR ABSTRACT

Comes now the Defendant and makes this his demand in writing to
the Plaintiff for an abstract in writing of the title on which he
will rely for recovery of the land for which he sued for.

Tolbert M. Brantley
Tolbert M. Brantley
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12th day of May
1967 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United State
Mail, properly addressed, and that such postage prepaid.

WITNESS MY HAND AND SEAL

By: Tolbert M. Brantley

FILED

MAY 12 1967


ALICE L. BUCK, CLERK
REGISTER

SAMUEL GRAVES LOWERY, as Executor
and Trustee under the Last Will
and Testament and Codicil of J. F.
B. Lowery, deceased,
Plaintiff,
VS.
JENKS HINOTE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7362

AMENDED COMPLAINT

Now comes the plaintiff in the above styled cause and
amends the complaint heretofore filed in said cause by adding
thereto the following parties as defendants: Charlie Greek, Annie
Greek, Lizzie Greek Hinote and Walker Hinote.


Attorney for Plaintiff

FILED

SEP 8 1907

AM. J. H. CLEARY
REGISTER

SAMUEL GRAVES LOWERY, as Executor)
and Trustee under the Last Will)
and Testament and Codicil of J. F.)
B. Lowery, deceased,)

Plaintiff,)

VS.)

JENKS HINOTE, ET AL,)

Defendants.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


NO. 7362

SUGGESTION OF DEATH OF JOINT DEFENDANT

Now comes the plaintiff in the above styled cause and suggests upon the record the death of the defendant, Charlie Greek, and moves the court to revive the said suit against the original defendants, Jenks Hinote, Annie Greek, Lizzie Greek Hinote and Walker Hinote and the heirs of Charlie Greek, to-wit, Alta Belle Greek, widow of Charlie Greek; Helen V. Greek, a daughter; John Greek, a son, and Suzie Lavine, a daughter.

Plaintiff further suggests upon the record that the afore-said children of the decedent, Charlie Greek, are all minors and non compos mentis.

WHEREFORE, plaintiff moves the court to substitute the heirs of the said Charlie Greek for him as joint parties defendant and also to appoint a guardian ad litem to represent them in this cause.


Attorney for Plaintiff

ORDER OF REVIVER

This cause is submitted on the suggestion of death of the joint defendant, Charlie Greek, from which it appears that the said defendant is now deceased and that he left surviving him a widow, Alta Belle Greek; a daughter, Helen V. Greek; a son, John Greek, and a daughter, Suzie Lavine, all of which said children are minors and non compos mentis; it is, therefore, ORDERED by the court that this cause be revived against Alta Belle Greek; Helen V. Greek;

John Greek and Suzie Lavine, as heirs of Charlie Greek, deceased,
and that Robert M. Bradley, Attorney at Law, be and he hereby
is appointed guardian ad litem to represent the said minor children
of the said decedent, Charlie Greek.

ORDERED on this 25th day of October, 1967.

Julius J. Marshburn
Judge

FILED

OCT 27 1967

WILLIAM L. DICKSON, CLERK
COURT OF COMMON PLEAS

SAMUEL GRAVES LOWERY, as Executor
and Trustee under the Last Will
and Testament and Codicil of J. F.
B. Lowery, deceased,

Plaintiff,

VS.

JENKS HINOTE, CHARLIE GREEK, ANNIE
GREEK, LIZZIE GREEK HINOTE and
WALKER HINOTE,

Defendants.

)
)
)
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW
)
)
) CASE NO. 7362
)
)
)
)

PLEAS

Comes now, Jenks Hinote, Charlie Greek, Annie Greek, Lizzie
Greek Hinote and Walker Hinote, the Defendants in the above styled
cause, and file the following Pleas to the Plaintiff's Amended Com-
plaint.

1.

Not guilty.

2.

The Plaintiff is barred from maintaining this suit by the
Statute of Limitations provided for in Title 51, Section 295 of the
Alabama Code.

WILTERS & BRANTLEY

BY: *William M Brantley*
Attorneys for Defendants

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 31 day of August,
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, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: *William M Brantley*

FILED

AUG 31 1967

ALICE J. DECK CLERK
REGISTER

7322

INVESTIGATION OF ACCIDENTS

REPORT OF INVESTIGATION

REPORT NO.

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

REPORT OF INVESTIGATION

FILED

AUG 31 1967

CLERK REGISTER
ALICE J. BUCK

We the Jury find for the
Defendants ~~and~~

Ellis

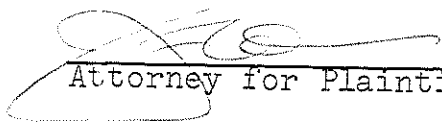
SAMUEL GRAVES LOWERY, as Executor)
and Trustee under the Last Will)
and Testament and Codicil of J. F.)
B. Lowery, deceased,)
Plaintiff,)
VS.)
JENKS HINOTE, ET AL,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7362

MOTION TO STRIKE

Now comes the plaintiff in the above styled cause and moves to strike Plea 2 heretofore filed by the defendants on August 31, 1967, and as grounds for said motion assign the following separately and severally:

1. The said plea is immaterial.
2. The said plea is irrelevant
3. The said plea is not allowed by Title 7, Section 941 of the Code of Alabama.


Attorney for Plaintiff

FILED

SEP 8 1967

ALICE J. DUCK

CLERK
REGISTER