

THE WESTERN AND SOUTHERN	)	IN THE CIRCUIT COURT
LIFE INSURANCE COMPANY, a	)	
corporation,	)	OF BALDWIN COUNTY,
	)	
Plaintiff,	)	ALABAMA
	)	
vs.	)	AT LAW
	)	
JOHN H. TYUS AND CONSUELLA	)	
W. TYUS, jointly and individually,	)	
	)	
Defendants.	)	CASE NO. 1753

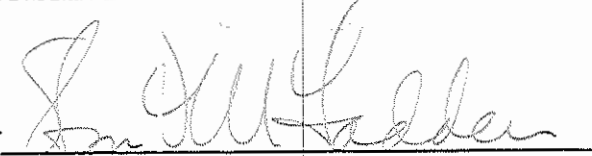
The plaintiff sues to recover possession of the following tract of land:

Lot 79, Daphmont, Unit No. 1, Daphne, Alabama, as per plat thereof recorded in the Office of the Judge of Probate, Baldwin County, Alabama, in Map Book 5, at page 7;

to the immediate possession of which the plaintiff is entitled by virtue of the purchase of said land at a sale of same on a foreclosure of a mortgage, and which the defendants, after the termination of their possessory interest, and after the plaintiffs demand in writing, therefore, unlawfully detain, together with \$900.00 for the detention thereof.

TONSMEIRE & McFADDEN

By


Attorneys for plaintiff

Serve defendants at:

Corner Johnson Road and Pine Street
Daphmont Subdivision
Daphne, Alabama

In unable to obtain personal service, post summons and complaint on front door of premises as per provisions of Title 62, Section 129, Code of Alabama, and show on return what manner service was perfected.

Of Counsel: Owens & Patton

SUMMONS AND COMPLAINT

MOORE PRINTING CO., 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

JOHN H. TYUS AND CONSUELLA W. TYUS

Corner Johnson Road and Pine Street

Daphmont Subdivision

Daphne, Alabama

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.....

John H. Tyus and Consuella W. Tyus

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

by THE WESTERN AND SOUTHERN LIFE INSURANCE COMPANY, a corporation.

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

Witness my hand this 25th day of September 19 67

Ex 10-7-67

Alice J. Luck Clerk

No. 7753

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

*The Western & Southern
Life Ins. Co.*

Plaintiffs

vs.

*John H. Lyles &
Consuello W. Lyles*

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

SEP 25 1967

ALICE J. DUCK

CLERK
REGISTER

James H. McFallen

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

SEP 25 1967

19.....

DAVID WILKINS

Sheriff

I have executed this summons

this

Oct 7

19.....

by leaving a copy with

*John H. Lyles
&
Consuello W. Lyles
Dyers*

108

18 20

R. R. Randall

DEPUTY SHERIFF

*Layla Wilkins
Roy Randall*

Sheriff

Deputy Sheriff