

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

October 23, 1967

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

no. 7803

Re: Jim Walter Corporation vs. Roy C. Wilhitt, Jr.

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 1, Box 58-A, 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,)	
)	AT LAW
VS.)	
ROY C. WILHITT, JR.)	
)	
Defendant.)	CASE NO. 7803

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:

Starting at the Southeast corner of the Southeast 1/4 of the Southeast 1/4 of Section 24, Township 6 South, Range 2 East for point of beginning; thence go North 105 feet; thence go East 105 feet; thence go South 105 feet; thence go West 105 feet; to the point of beginning. Containing 1/2 acre more or less.

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:

Starting at the Southeast corner of the Southeast 1/4 of the Southeast 1/4 of Section 24, Township 6 South, Range 2 East for point of beginning; thence go North 105 feet; thence go East 105 feet; thence go South 105 feet; thence go West 105 feet; to the point of beginning. Containing 1/2 acre more or less.

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

FILED

OCT 25 1967

ALICE J. DUCK CLERK
REGISTER

BY E. Graham Gibbons
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 1, Box 58-A
Fairhope, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7803

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Roy C. Wilhitt, Jr.

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.....

.....Roy C. Wilhitt, Jr....., Defendant.....

byJim Walter Corporation, a Corporation.....

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

Witness my hand this 25th day of October 19 67

Alice J. Wilhitt
.....Clerk

Ex: 11-9-67

761

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JIM WALTER CORPORATION, A CORP.,
Plaintiffs

vs.

ROY C. WILHITT, JR.,
Defendants

SUMMONS AND COMPLAINT

Filed ..October 25..... 19.67..
Alice J. Duck, Clerk

Gibbons & Stokes
Plaintiff's Attorney
Defendant's Attorney

R.T. Roper 58 Deputy Sheriff

Defendant lives at

RECEIVED
Received in Office

OCT 25 1967

TAYLOR WILKINS
SHERIFF

I have executed this summons

this 9th day of October 1967
by leaving a copy with

Roy C. Wilhitt Jr.

Deputy Clerk

70

70

TAYLOR WILKINS

DEPUTY SHERIFF

DEPUTY SHERIFF

Deputy Sheriff

Roy Roper Deputy Sheriff