

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
B. F. STOKES, III

November 17, 1967

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

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

7804

~~Re: Mid-State Homes, Inc. vs. Claude C. Hartley and
Edith Hartley~~

Dear Mrs. Duck:

Please non-suit the above captioned matter which I recently
filed. The matter has been settled. I enclose herewith my
check for court costs.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EGG:ms
Enc. (check)

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E. GRAHAM GIBBONS
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MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

October 24, 1967

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

No. 7804

Re: Mid-State Homes, Inc. vs. Claude C. Hartley and
Edith Hartley

Dear Mrs. Duck:

I enclose herein an original and two copies 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 defendants' address is Route 2, Box 158-A, Fairhope, Alabama.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EGG:he

Enclosure

| | | |
|------------------------|---|-------------------------|
| MID-STATE HOMES, INC., |) | IN THE CIRCUIT COURT OF |
| A Corporation, |) | |
| |) | BALDWIN COUNTY, ALABAMA |
| Plaintiff, |) | |
| |) | AT LAW |
| VS. |) | |
| |) | |
| CLAUDE C. HARTLEY and |) | |
| EDITH HARTLEY, Jointly |) | |
| and Individually, |) | |
| |) | |
| Defendants. |) | CASE NO. <u>7404</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:

Begin at the NW corner of the SW 1/4 of the NE 1/4 of Section 22 and run South a distance of 315 feet to the point of beginning; thence continue South along same line a distance of 105 ft.; thence run East a distance 210 feet; run North 105 feet, run West 210 feet to point of beginning. (1/2) 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:

Begin at the NW corner of the SW 1/4 of the NE 1/4 of Section 22 and run South a distance of 315 feet to the point of beginning; thence continue South along same line a distance of 105 ft.; thence run East a distance 210 feet; run North 105 feet, run West 210 feet to point of beginning. (1/2) 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.

FILED

OCT 25 1967

ALICE J. DICK

CLERK
REGISTER

GIBBONS & STOKES

BY

E. Graham Gibbons

Attorney for the Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7804

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Claude C. Hartley and Edith Hartley, Jointly &

..... Individually

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..... Claude C.

Hartley and Edith Hartley, Jointly & Individually, Defendant.....

by Mid-State Homes, Inc., a Corp.

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

Witness my hand this..... 25th..... day of..... October..... 1967.....

Ex-10-31-67

Alise J. Week Clerk

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MID-STATE HOMES, INC., A CORP.,

Plaintiffs

vs.

CLAUDE C. HARTLEY & EDITH
HARTLEY, Jointly & Ind.
Defendants

SUMMONS AND COMPLAINT

Filed October 25, 1967

Alice J. Duck, Clerk

Gibbons & Stokes
Plaintiffs Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received in Office

OCT 25 1967

19

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this

Oct 31 1967

by leaving a copy with

Claude C. Hartley

Edith Hartley
Barnwell

Sheriff claims

200

Ten Cents per mile Total

20-

BY Ray Randle
Deputy Sheriff


Taylor Wilkins

Sheriff

Ray Randle

Deputy Sheriff

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 158-A
Fairhope, Alabama