

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
B. F. STOKES, III
WILLIAM L. HOWELL

May 26, 1969

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

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

Re: Mid-State Homes, Inc. vs Katie Lee Bryant
Case No. 7805

Dear Mrs. Duck:

Please non suit the above case on motion of the plaintiff.
Please also forward me the cost bill in this matter.

Sincerely,


E. Graham Gibbons

EGG/al

FILED

MAY 27 1969

ALICE J. BRYAN CLERK
REGISTER

GIBBONS & STOKES

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160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

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. 7805

Re: Mid-State Homes, Inc. vs. Katie Lee Bryant

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 229, Daphne, Alabama.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EGG:he

Enclosure

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 7805

Now comes the Defendant, Katie Lee Bryant, by her Attorneys, and for answer to the complaint heretofore filed against her and to each Count thereof, separately and severally, says:

OWENS AND PATTON

I, the undersigned, one of the attorneys of record for the Defendant in the foregoing cause, do hereby certify that I have this day forwarded a copy of the foregoing answer to E. Graham Gibbons, the attorney of record for the Plaintiff by placing a copy of the same in the United States Mail, properly addressed, with postage prepaid, this 29th day of January, 1968.

FILED

JAN 30 1968

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7805

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonKatie Lee Bryant.....

.....
.....
.....

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.....

.....Katie Lee Bryant....., Defendant.....

byMid-State Homes, Inc., a Corp.

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

Witness my hand this.....25th.....day of.....October.....19.....67.....

.....*Alice J. Clark*.....Clerk

EX-1-5-68

No. 7805

Page

*Shirley the P
Lawrence*

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

M.D.-STATE HOMES, INC., A. CORP.

Plaintiffs

vs.

KATIE LEE BRYANT,

Defendants

SUMMONS AND COMPLAINT

Filed October 25, 1967

Alice J. Duck

Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

RT. 1 Box 229 Daphne

*Could not find
Randall*

RECEIVED
DEPT. OF CORRECTIONS
NOV 1 1967

RECEIVED
DEPT. OF CORRECTIONS
NOV 1 1967

TAYLOR WILKINS
SHERIFF

I have executed this summons

this

1967

by leaving a copy with

Katie Lee Bryant

Daphne

Act
20
25
1967
Shirley

Fayla Wilkins

Sheriff

Roy Randall

Deputy Sheriff

MID-STATE HOMES, INC.)	IN THE CIRCUIT COURT OF
A Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	AT LAW
VS.)	
)	
KATTIE LEE BRYANT,)	
)	
Defendant.)	CASE NO. <u>7405</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:

From the SE corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the East boundary of said Section, 388.4 feet more or less to a point on the North boundary of the South 1/2 of the SE 1/4 of the SE 1/4 of said Section 28; thence run East along the said North boundary of South 1/2 of SE 1/4 of SE 1/4 336.4 feet to a point on the East boundary of said Section 28; thence run South along the said Section line 388.4 feet more or less to the point of beginning. Containing 3.0 acres more or less on the S 1/2 of the SE 1/4 of SE 1/4 of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama.

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:

From the SE corner of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama, run North along the East boundary of said section 28, 276.6 feet for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the East boundary of said Section, 388.4 feet more or less to a point on the North boundary of the South 1/2 of the SE 1/4 of the SE 1/4 of said Section 28; thence run East along the said North boundary of South 1/2 of SE 1/4 of SE 1/4 336.4 feet to a point on the East boundary of said Section 28; thence run South along

the said Section line 388.4 feet more or less to the point of beginning. Containing 3.0 acres more or less on the S 1/2 of the SE 1/4 of SE 1/4 of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama.

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

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
E. Graham Gibbons
Attorney for the Plaintiff

Serve the defendant at:

Route 1, Box 229
Daphne, Alabama

FILED

OCT 25 1967

ALICE J. DUCK CLERK
REGISTER