

MID-STATE HOMES, INC.)	IN THE CIRCUIT COURT OF
A Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
)	AT LAW
VS.)	
)	
GEORGE WESLEY SMITH and)	
NAOMI DAILEY SMITH,)	
Jointly and Individually,)	
)	
Defendants.)	CASE NO. <u>2929</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 center of Sec. 16, Township 5 South, Range 3 East Run North 333 feet to a point, run thence West along the South line of the property of the Grantors as described in that deed of correction dated Feb. 20, 1956 and recorded in Deed Book 237, page 512 Baldwin County

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 center of Sec. 16, Township 5 South, Range 3 East Run North 333 feet to a point, run thence West along the South line of the property of the Grantors as described in that deed of correction dated Feb. 20, 1956 and recorded in Deed Book 237 Page 512 Baldwin County

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: Loxley, Alabama

FILED

DEC 27 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7929.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonGeorge Wesley Smith & Naomi Dailey Smith,.....
.....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 George Wesley
Smith & Naomi Dailey Smith, Jointly & Individually....., Defendant.....

by Mid-State Homes, Inc., a Corporation.....
....., Plaintiff.....

Witness my hand this.....27th.....day of.....December.....19 67.....

Alice J. Duck Clerk

84:1-11-68

867

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MID-STATE HOMES, INC., A Corp.

Plaintiffs

vs.

GEORGE WESLEY SMITH & NAOMI

DAILEY SMITH, Jointly & Ind. Defendants

SUMMONS AND COMPLAINT

Filed December 27, 1967

Alice J. Duck Clerk

Gibbons & Stokes

P. O. Box 293 Plaintiff's Attorney
Mobile, Ala.

Defendant's Attorney

Defendant lives at

Received In Office

12/27 1967

Taylor Wilkins Sheriff
I have executed this summonsthis 11 Jan 1968
by leaving a copy withGeorge Wesley Smith
Naomi Dailey Smith

Sheriff's clerk 80 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

Carline L. Linder Deputy Sheriff

Taylor Wilkins, Sheriff

Carline L. Linder Deputy Sheriff

Loyley

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
B. F. STOKES, III

December 22, 1967

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

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

Re: Mid-State Homes, Inc. vs. George W. Smith

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 defendant's address is General Delivery, Loxley, Alabama.

Thank you very much for your attention to this matter.

Sincerely,


E. Graham Gibbons

EKG:he

Enclosure

1929