

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JIM J. BROWN

to appear within thirty days from the date of this Writ
in the Circuit Court to be held for said County at the
place of holding same, then and there to answer the
Complaint of MID-STATE HOMES, INC., a corporation.

Witness my hand this 23 day of Oct, 1968.

Oliver J. Smith
Clerk

MID-STATE HOMES, INC.
a corporation,
PLAINTIFF

VS.

JIM J. BROWN,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

8290

COMPLAINT

COUNT ONE: The Plaintiff sues to recover possession of the
following tract of land in Baldwin County, Alabama:

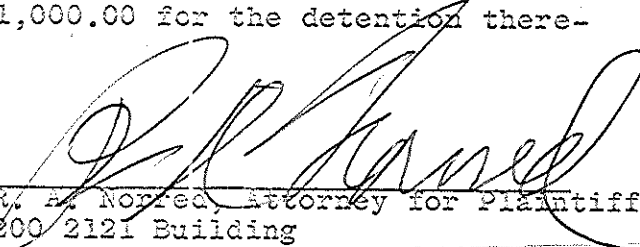
Begin at the Northwest corner of the SE $\frac{1}{4}$ of Section
12, Township 3 South, Range 2 East, thence run South
1114.3 feet to a corner, thence run East 586 feet to a
point, thence run South 155 feet to the point of beginning;
thence run South 148 feet to a point, thence run West
148 feet to a point, thence run North 148 feet to a
point, thence run East 148 feet more or less back to
the point of beginning.

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, 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:

(The Plaintiff incorporates herein as if fully and completely set out at length herein by reference and adoption, the full legal description of the real estate set out and described in Count One of the Complaint.)

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 defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.


R. A. Norred, Attorney for Plaintiff
200 2121 Building
2121 8th Avenue, North
Birmingham, Alabama 35203
Telephone 323-4076

PLAINTIFF'S ADDRESS:

Mid-State Homes, Inc.
c/o R.A. Norred, Attorney
2121 8th Ave. North
200 2121 Building

DEFENDANTS' ADDRESS:

Jim J. Brown
Rt. 1 Box 210
Bay Minette, Alabama

FILED

OCT 23 1968

ALICE J. DUCK

CLERK
REGISTER

Received 23 day of Oct 1968
and on 2 day of Nov 1968
I served a copy of the within etc
on James J. Brown

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W.D. Davis
DEPUTY SHERIFF

By service on _____

TAYLOR WILKINS, Sheriff
By W.D. Davis
White House Fork

R. A. Worred, Atty

Summons & Complaint

vs.
Jim J. Brown
West

Mid-State Homes
Inc. a corp.
Plt

8390

FILED
OCT 23 1968
AUGIE J. DICK
CLERK
REGISTER

MID-STATE HOMES, INC.,
a corporation

Plaintiff

vs

JIM J. BROWN

Defendant


X
X
X
X
X
X

IN THE CIRCUIT COURT OF

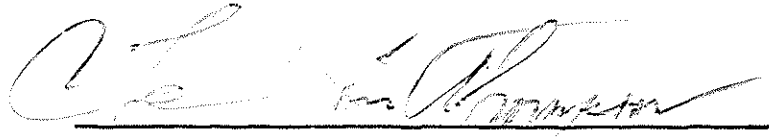
BALDWIN COUNTY, ALABAMA

AT LAW NO. 8390

Comes C. LeNoir Thompson and files this, his appearance
as attorney for Jim J. Brown, in the above styled cause.


Attorney for Jim J. Brown

I hereby certify that I have this 1 day of February,
1969, served a copy of the foregoing on Honorable R. A.
Norred, Attorney for the plaintiff, by depositing copy of
same in the U. S. Mail, postage prepaid, properly addressed
to his office, 200 2121 Building, 2121 8th Avenue, North,
Birmingham, Alabama 35203.


C. LeNoir Thompson

FILED

FEB 3 1969

ALICE J. DUCK CLERK
REGISTER

R. A. Norred

ATTORNEY

200 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
TELEPHONE
323-4076

October 22, 1968

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

8390

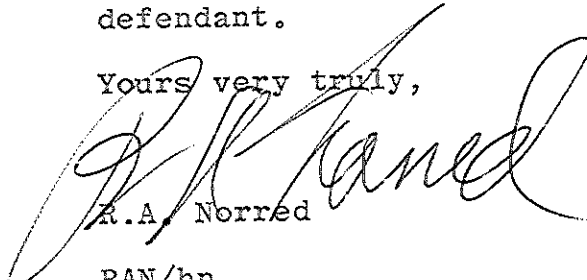
Re: Mid-State Homes, Inc.
vs.
Jim J. Brown

Dear Mrs. Duck:

I enclose herein an original and 1 copy of a Summons and Complaint for filing and service in the above. The defendant's address is Rt. 1 Box 210, Bay Minette, Alabama.

I would appreciate it very much if you would acknowledge receipt of same, confirming the filing date, and if you would also advise when service has been perfected on this defendant.

Yours very truly,


R.A. Norred

RAN/hn

Enc.